



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

February 9, 2016

Arkansas Department of Health
Mr. Jeff Stone, P.E.
Director
Engineering Section
4815 West Markham, Slot H 37
Little Rock, AR 72205-3867

Dear Mr. Stone:

Enclosed is the Fiscal Year 2015 program review of the Arkansas Department of Health (ADH) Public Water Supply Supervision (PWSS) Program. This program review summarizes ADH's primacy requirements, program implementation of new and existing regulations, and other key drinking water activities conducted by ADH. EPA Region 6 applauds ADH for their continued initiative in the early implementation and adoption of new drinking water regulations, addressing citizen concerns and special requests immediately upon notification, and their continued commitment to fiscal responsibility.

Thank you for your participation during the onsite PWSS program review. Please contact Mr. Jatin Mistry of my staff at (214) 665-7483 should you have questions or concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "James R. Brown", is positioned above the printed name.

James R. Brown, P.G.
Associate Director
Safe Drinking Water Branch

Enclosure

cc: Mr. Lance A. Jones, P.E.
Chief Engineer
ADH

Mr. Lyle Godfrey, P.E.
Chief, Technical Support
ADH

US Environmental Protection Agency
Region 6
Fiscal Year 2015 Program Review
For the
Arkansas Department of Health - Engineering Section
Public Water System Supervision (PWSS)

Review Conducted by
EPA Region 6
Safe Drinking Water Branch
Drinking Water Section

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I. Introduction

This report reviews the Arkansas Department of Health's (ADH) Public Water Supply Supervision (PWSS) Program under the Safe Drinking Water Act (SDWA). Title 40 of the Code of Federal Regulations (40 C.F.R.) part 142.17 (a)(1) states: "At least annually the Administrator shall review, with respect to each State determined to have primary enforcement responsibility, the compliance of the State with the requirements set forth in 40 C.F.R. part 142, subpart B, and the approved State primacy program." This report summarizes the required primacy End-of-Year (EOY) review of the Arkansas Department of Health's Engineering Section's Public Water Supply Supervision Program by the United States Environmental Protection Agency's (EPA) Region 6 Safe Drinking Water Branch, Drinking Water Section for Fiscal Year 2015.

The ADH program elements, which were previously adopted by the State and approved by EPA to meet 40 C.F.R. 142.10 primacy requirements, are examined as well as State activities to meet new primacy requirements and initiatives under the 1996 Amendments to the Safe Drinking Water Act. This report also documents ADH's initiatives, activities, and achievements undertaken to meet and/or exceed the national drinking water standards. EPA will continue to work in partnership with ADH to strengthen the PWSS program, enhance program efficiency and compliance determination, and assure public health protection to Arkansans' access to cost effective and superior quality drinking water.

II. Background

The PWSS Program Review EOY meeting was conducted in person at the Arkansas Department of Health's Engineering office in Little Rock, Arkansas, on December 15, 2015. In addition to the meeting, a teleconference was utilized to allow participation from the EPA Region 6 program office in Dallas regarding discussions on funding and data systems.

Tables 1A and 1B lists the meeting attendees.

ADH PWSS Program Review Attendee Table: (Table 1A-ADH Staff)

Name	Title	Email	Phone
Jeff Stone	Director, Engineering Section	Jeffery.Stone@arkansas.gov	501-661-2693
Lance Jones	Chief Engineer	Lance.Jones@arkansas.gov	501-661-2775
Lyle Godfrey	Chief, Technical Support	Lyle.Godfrey@arkansas.gov	501-661-2623
Teresa Lee	Engineer Supervisor	Teresa.Lee@arkansas.gov	501-661-2623
Martin Nutt	Certification Officer/Training	Martin.Nutt@arkansas.gov	501-661-2504

Name	Title	Email	Phone
David Bradley	Data Analyst	David.Bradley@arkansas.gov	501-671-1444
Gregory Treadway	Computer Support Coordinator	Gregory.Treadway@arkansas.gov	501-661-2502
Craig Corder	Engineering Supervisor	Craig.Corder@arkansas.gov	501-661-2623
Amelia Trimble	Budget Analyst	Amelia.Trimble@arkansas.gov	501-661-2620
Robin Michaels	Compliance and Enforcement Officer	Robin.Michaels@arkansas.gov	501-661-2172
Susan Corder	Pollution Control Inspector Supervisor	Susan.Corder@arkansas.gov	501-661-2623

ADH PWSS Program Review Attendee Table: (Table 1B-EPA R6 Staff)

Name	Title	Email	Phone
Jatin Mistry	Life Scientist	Mistry.Jatin@epa.gov	214-665-7483
Jim Brown	Associate Director Safe Drinking Water Branch	Brown.jamesr@epa.gov	214-665-3175
Tonia Biggs	Enforcement Officer	Biggs.tonia@epa.gov	214-665-8551
Shirley Mlachak (remote)	Data Coordinator	Mlachak.shirley@epa.gov	214-665-2267
Gregory Parrish (remote)	PWSS Project Officer	Parrish.gregory@epa.gov	214-665-6586

III. Arkansas Drinking Water System Universe

A Public Water System (PWS) is defined as a system that provides water for human consumption through pipes or other constructed conveyances to at least 15 service connections or serves an average of at least 25 people for at least 60 days a year. EPA has defined three types of public water systems:

1. Community Water Systems (CWS): A public water system that regularly supplies water to at least 25 year-round residents or to at least 15 service connections.

2. Non-Transient Non Community Water System (NTNCWS): A public water system that is not a community water system and that regularly supplies water to at least 25 of the sample people at least six months of the year. Some examples are schools, factories, office buildings, and hospitals which have their own water systems.
3. Transient Non-Community Water System (TNCWS): A non-community water system that does not regularly serve at least 25 of the same persons over six months of the year such as gas stations or campgrounds.

The typical PWS sources found in the state of Arkansas are ground water, purchased ground water, surface water, purchased surface water, ground water under the direct influence of surface water, and purchased ground water under the influence of surface water.

The EPA water system size classifications used in this report are based on the following:

Small systems serve 25 to 3,300 people
Medium systems serve 3,301 to 10,000 people
Large systems serve more than 10,001 people

According to the Federal Safe Drinking Water Information System's (SDWIS FED) frozen data as of October 2015, the State of Arkansas has a total of 1,064 PWSs serving 3,077,216 people as illustrated in the following Arkansas PWS Population Table (Table 2). Within EPA Region 6, there are 12,226 water systems that serve 40,964,062 people (Table 3). The State of Arkansas' water systems represents 8.7% of this Regional total.

Table 2
Arkansas PWS Population Table

State	Type	GU		GUP		GW		GWP		SW		SWP		Total Sys	Total Pop
		Sys	Pop	Sys	Pop	Sys	Pop	Sys	Pop	Sys	Pop	Sys	Pop		
AR	C	3	7,886			318	778,583	73	65,755	69	1,147,232	236	1,046,265	699	3,045,721
	NTNC					26	7,353	1	214			3	3,031	30	10,598
	TNC	7	576	1	30	159	15,141	40	1,195	10	410	118	3,545	335	20,897
AR Total		10	8,462	1	30	503	801,077	114	67,164	79	1,147,642	357	1,052,841	1,064	3,077,216

GU = Ground Water Under the Direct Influence of Surface Water
 GUP = Ground Water Under the Direct Influence of Surface Water Purchased
 GW = Ground Water
 GWP = Ground Water Purchased
 SW = Surface Water
 SWP = Surface Water Purchased

 C = Community Water System
 NTNC = Non Transient Non Community
 TNC = Transient Non Community

Table 3
Region 6 PWS Population Table

State	Type	GU		GUP		GW		GWP		SW		SWP		Total Sys	Total Pop
		Sys	Pop	Sys	Pop	Sys	Pop	Sys	Pop	Sys	Pop	Sys	Pop	Sys	Pop
R6	C	37	59,440	8	5,532	5,271	10,406,681	472	698,750	636	18,050,641	1,614	10,564,533	8,038	39,785,577
	NTNC			1	6,000	1,161	383,691	32	21,259	20	15,410	117	292,709	1,331	719,069
	TNC	24	7,376	5	131	2,349	389,118	114	12,249	37	14,754	328	35,788	2,857	459,416
R6 Total		61	66,816	14	11,663	8,781	11,179,490	618	732,258	693	18,080,805	2,059	10,893,030	12,226	40,964,062

GU = Ground Water Under the Direct Influence of Surface Water
 GUP = Ground Water Under the Direct Influence of Surface Water Purchased
 GW = Ground Water
 GWP = Ground Water Purchased
 SW = Surface Water
 SWP = Surface Water Purchased

 C = Community Water System
 NTNC = Non Transient Non Community
 TNC = Transient Non Community

IV. Primacy Program Summary

A. Organizational Structure

The primacy program for the State of Arkansas' Drinking Water Program is housed within the Arkansas Department of Health's Center for Local Public Health Environmental Health Branch's Engineering Section under the direction of Mr. Jeff Stone, P.E. Under the Field Surveillance Group, the State of Arkansas is divided into 9 engineering districts. The management roles within the Engineering Section are described below:

Mr. Jeff Stone, P.E.	Director, Engineering Section
Mr. Lance Jones, P.E.	Chief Engineer
Mr. Lyle Godfrey, P.E.	Chief, Technical Support
Mr. A. Martin Nutt	Water Operator Certification Officer
Mr. Gregory Treadway	Information Systems Supervisor
Ms. Amelia Trimble	Supervisor, Administrative Support
Ms. Robin Michaels	EHS Compliance Officer

B. Staffing Needs / Outsourcing Activities

ADH is currently authorized for 74 positions within the Engineering Section. Due to the current hiring cap and state employment freeze within Arkansas, ADH does not foresee any growth of the Engineering Section with the addition of new staff. At the present time, the Engineering Section has 68 filled positions with openings for two Engineering Technicians in the water quality sampling section, two specialists in the source water section, and two Engineers for District 1. The Engineering Section also does not foresee any reorganizations taking place within the Agency.

Currently ADH is unable to fill positions funded by state fees due to a hiring freeze. An example of this type of position is the Water Quality Sampling Technician.

Positions funded by federal funds are not under the hiring freeze and can be filled. ADH continues to re-advertise positions more than once before finding a suitable applicant that would accept the State's entry level salary. Overall, this process can take anywhere from two to three months and has been most noticeable in the hiring categories for engineers, environmental health specialists, and geographic information system specialists.

At the management level of the ADH Engineering Section, there are no immediate plans by Mr. Stone, Mr. Jones, or Mr. Godfrey to retire or leave the agency in FY 2016. Succession planning discussions have taken

place regarding the preparation of budget reviews and quality assurance project plans among Mr. Godfrey, Mr. Jones, and Mr. Stone to ensure a smooth transition.

C. Sample Collection, Analysis, and Laboratory Certification

The ADH Engineering Section has six drinking water sampler positions that collect drinking water compliance samples from ADH regulated drinking water systems. Currently there are two openings for these positions, but the positions are funded by state fees which have been placed under a hiring freeze. However, ADH is evaluating an option of having to contract out the services of the Water Quality Sampling Technician to laboratories in Arkansas that can assist the Engineering Section with water quality sampling for the Stage 2 Disinfectants and Disinfection Byproducts monitoring.

These samplers play a vital role for the drinking water program by achieving a near 100% compliance rate for samples collected by the State. In Arkansas, the ADH drinking water samplers are tasked to collect all organic, inorganic, radionuclide, and special samples such as the Unregulated Contaminant Monitoring Rule (UCMR). There is discussion of having the samplers collect water samples for cyanotoxins in the future where the analyses will be performed by McCampbell Analytical Laboratories.

The samples that the water system operator is tasked with taking are lead and copper, fluoride, and bacteriological samples. The only samples that are contracted out to a private laboratory are analyses for *Cryptosporidium* under the Long Term 2 Enhanced Surface Water Treatment Rule.

During the primacy application review of the Revised Total Coliform Rule, EPA Region 6 noticed that laboratory turnaround times for bacteriological samples from initial sampling to results could be anywhere from 10 to 14 days. ADH Engineering has worked with the laboratory to address this turnaround time concern and has now reported that the average turnaround time for bacteriological samples has decreased to four days from sample to result. This improvement in quickly releasing final laboratory results will allow ADH Engineering to conduct follow up inquiries with water systems regarding Level 1 or Level 2 assessments.

The ADH drinking water laboratory's was audited by EPA Region 6 in 2015 and the EPA laboratory accreditation is current until February 28, 2016.

D. ADH Public Water System Fee Program

The Public Water System Service Fee is used to provide assistance to public water systems for the purpose of ensuring compliance with the Safe Drinking Water Act such as water sample collection, laboratory analysis, and required reporting of results to the EPA. In addition, the fee also assists with program staff salaries, water operator training, capital equipment, travel, public education, and well head protection services. The fee currently generates \$4.1 million per year.

At the present time, ADH relies on public water system service fees and Drinking Water State Revolving Fund (DWSRF) Set Asides to properly staff the State's drinking water program. No new additional revenue streams nor increases in fees are anticipated in 2016 to assist the program; however, program costs are expected to rise in the upcoming years as new drinking water rules are implemented.

The last fee increase was in 2007 where the fee was increased from \$0.25 to \$0.30 per meter. This equated to about \$0.25 in purchasing power for FY2015, but a fee of \$0.37 is needed for today's purchasing power. If a fee increase is not implemented, the drinking water program may not be able to replace laboratory equipment, assist utilities with compliance monitoring, or provide technical assistance to water systems.

E. Legislative Updates

The next sessions of the Arkansas State Legislature will consist of the fiscal session in 2016 from April 14, 2016 to May 12, 2016, and then the General Assembly in 2017. In preparation for the 2017 General Assembly, ADH Engineering will work with their management team to gauge interest among the regulated drinking water entities about the prospect of a potential public water system fee increase.

Act 197 requires public water systems serving a total population of 5,000 or more persons to fluoridate. In 2015, there were 102 Arkansas water systems that added fluoride to their drinking water which covered about 76.6% of the state's population. There are no plans to repeal this Act.

V. Program Initiatives

A. Small Systems Assistance (Capacity Development)

Within the State of Arkansas, there are a number small community water systems that need additional assistance to understand and implement EPA drinking water rules. To assist these small water systems, ADH relies on three technical services contracts that target capital development of

public water systems. These contracts focus on the following:

1. Financial and Management needs (Arkansas Rural Water)
2. Technical operator assistance (Arkansas Rural Water)
3. National Grant (Community Resource Group – Rural Community Assistance Partnership)

The financial management contract's focus is asset management, rate studies, budget analysis, and long range planning to make utilities self-sufficient and be on strong financial footing. A recent focus effort of the Arkansas Rural Water Association has been on board member training to educate newly elected board members how water utilities operate and function. The technical operator assistance contract is focused on providing assistance to reach out to water systems with current compliance issues and reduce the number of future potential violations.

The National Grant is managed by the Community Resource Group's Rural Community Assistance Partnership which will focus on compliance with the new Revised Total Coliform Rule, 2016 Consumer Confidence Reports, and Ground Water Rule.

B. Operator Certification

ADH adopted the Operator Certification program with final approval from EPA in March 2001. As part of the reauthorization of SDWA, the DWSRF program was established for States to finance infrastructure improvements for public water systems. In order for States to avoid a 20% withholding of the State's DWSRF current allotment, the State must report to EPA that it is implementing a program for certifying operators of community and non-transient, non-community drinking water systems, in accordance to the requirements of section 1419 of the SDWA.

ADH offers two types of operator certifications: Distribution and Treatment. The distribution certification consists of five classifications and the treatment certification that consists of four classifications. In all, the more complex the system and population it serves, the higher the level of certification. Operator certifications are valid for two years whereby operators must maintain their current level of certification by having 24 hours of continuing education. The number of licensed operators in Arkansas is illustrated in the Drinking Water Operator Licenses in Arkansas table below for years 2012, 2013, and 2014 (Table 4).

Table 4
Drinking Water Operator Licenses in Arkansas

# of Water Systems	Community PWS			NTNCPWS			Transient PWS		
	2012	2013	2014	2012	2013	2014	2012	2013	2014
License Required	717	702	698	35	35	32	19	19	22
Have Licensed ORC (December 31, 2013)	703	692	695	35	34	32	17	19	22
Need License	14	10	3	0	1	0	2	0	0
Per Cent Compliant	98%	98.5%	99.5	100%	97%	100 %	89%	100%	100 %

Currently there are 2,040 active drinking water operators and 141 Operator-In-Training in the State of Arkansas. There are a total of 3,154 licensed operators consisting of treatment and distribution.

ADH has two contracts in place to assist with operator certification; one with the Southern Arkansas University Tech's Arkansas Environmental Training Academy (AETA) and the other with Arkansas Rural Water Association (ARWA). Both AETA and ARWA are to teach up to two classes each month. Both organizations focuses on operators who are preparing for examination of the mandatory courses or seeking training for license renewal. In the state of Arkansas, most of the demand or operator training classes is from Central Arkansas and North East Arkansas.

Fiscal Year 2012 marked the end of the Operator Certification Grant which ADH utilized to train water operators. During Fiscal Year 2013, ADH relied on the use of the state's operator certification grant funding and State Revolving Funds (SRF) to maintain this program. In 2014, the program was impacted once again with the expiration of the operator certification contracts with AETA and ARWA, which took place on June 30, 2014. The loss of these contracts caused a significant decrease in the ability to offer mandatory courses in 2015 and additional training cuts may also occur in calendar year 2016.

The license program had two other significant exam process changes that took effect July 1, 2014. The changes included moving to the Association of Boards of Certification (ABC) validated national standardized exams and utilizing a computer-based format exam through Applied Measurement Professionals Exam Assessment Centers. One concern raised by ADH regards operator reciprocity where under the ABC system, an operator licensed by another entity must sit for the ABC Professional Operator License exam to obtain reciprocity.

ADH requires that all licensed operators obtain 24 hours of continuing education every two year renewal cycle. At least 12 contact hours of the required 24 hours must be training directly related to water system operations.

The current passing rates for the exams are shown below (Table 5):

Table 5
Passing Rates for Operator Exams in Arkansas

Distribution		Treatment	
Level 1	57%	Level 1	38%
Level 2	57%	Level 2	68%
Level 3	27%	Level 3	16%
Level 4	23%	Level 4	16%

The EPA Region 6 point of contact for Operator Certification is Mrs. Amy Camacho and she can be reached at 214-665-7175.

C. Sanitary Survey

The Engineering Section of ADH conducts sanitary surveys for community water systems using surface water every two years and for systems using ground water, purchased ground water, or purchased surface water, surveys are conducted every three years. In FY 2015, 375 sanitary surveys were conducted by ADH. For FY 2016, ADH anticipates to conduct around 400 surveys.

The number of drinking water vending machines continues to increase in Arkansas and are typically centered in the remote areas of the state. There are currently 162 active drinking water vending machines in the ADH drinking water inventory that are operated either by corporations or by independent operators and 1 ADH regulated water hauler. The state has no barge operators that deliver drinking water.

D. Arkansas Area Wide Optimization Program

ADH's management support for the Area Wide Optimization Program (AWOP) continues to be strong and through this support, the ADH program is one of Region 6/7's highly recognized AWOP programs in the Region. The program remains limited by staff time and not by travel or budget restrictions.

During 2015, the ADH AWOP major program activities consisted of the following:

- Attended Regional multi-state events
- Conducted Comprehensive Performance Evaluations (CPE) at Central Arkansas Water's Jack Wilson plant and at Montgomery County Regional
- Conducted data audits
- Provided targeted technical assistance in the areas of

- chloramination, disinfection byproduct control, and harmful algal blooms
- Verification of calibrations for turbidimeters, pH meters, and chlorine test kits

Current staff members on the ADH AWOP program are listed in the ADH AWOP member table (Table 6).

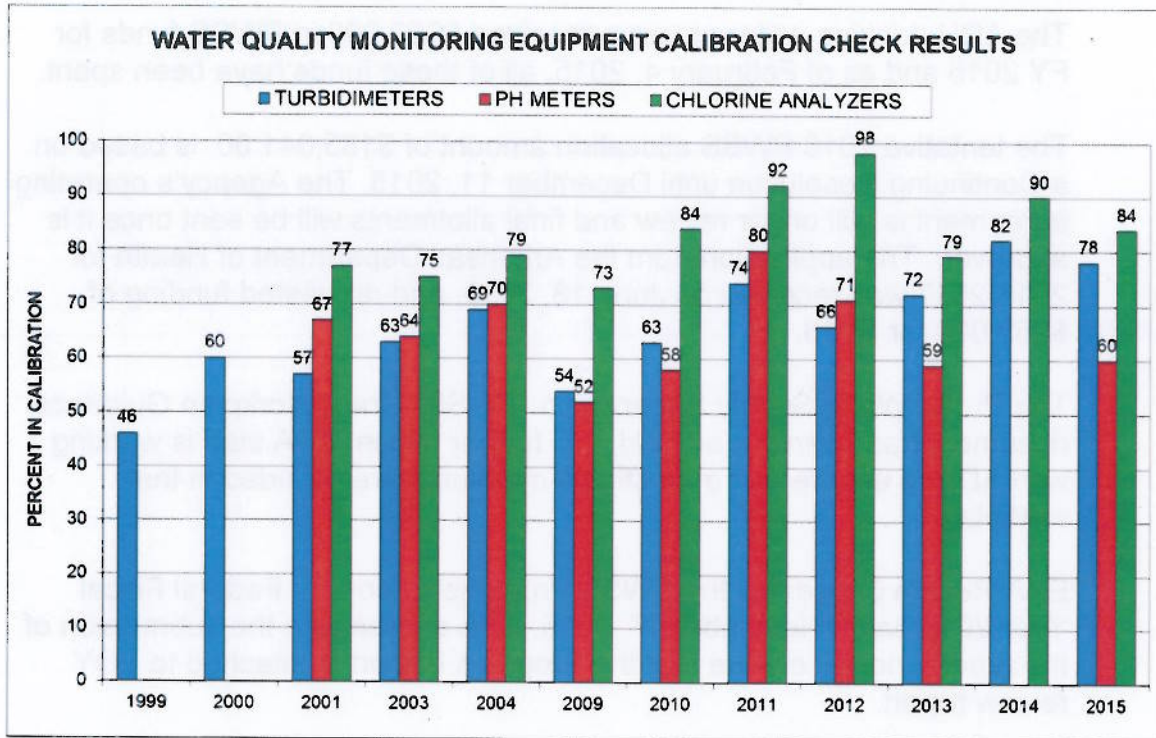
Table 6
ADH AWOP Members

Craig Corder	Jeff Stone	Lance Jones	Lyle Godfrey
Trent Gephardt	Aaron Hilborn	Ashley Hobbs	Bob Arthur
Chris Roberts	Don Fiegel	Linda Taylor	Ken Bown
Marshall Hatfield	Steve Burghart	Vickie Welytok	

For 2016, the ADH AWOP will hire a replacement CPE engineer, continue to participate in AWOP multi state activities, data integrity workgroup meetings, maintain the turbidity database, conduct three CPEs and data audits, and continue to provide targeted technical assistance to water systems.

The Water Quality Monitoring Equipment Calibration Check Results in Table 7 show the results of the equipment calibration check project that documents how much water quality testing equipment is in calibration verses out of calibration. During FY 2015, 35 surface water treatment plants were visited where the calibration was checked for 336 turbidimeters, 62 pH meters, and 100 chlorine analyzers. The results indicate that the percentage of instruments in calibration have decreased from FY2014.

Table 7
Water Quality Monitoring Equipment Calibration Check Results



F. Homeland Security

With no additional funding since expiration of the Counter Terrorism Grant in 2012, ADH efforts in this area are limited. ADH continues to keep up its presence in this area by writing quarterly newsletter articles regarding personal protective equipment, petroleum transport, winterizing, and emergency operations communications.

At the time of the Arkansas End of Year discussion, no homeland security related activities have been scheduled for FY 2016. Mr. Stone stated that the Water Information Sharing and Analysis Center (WaterISAC) will focus on cyber security related issues impacting water treatment plant appurtenances.

ADH informed EPA Region 6 that the 24 hour emergency phone number for the Arkansas Drinking Water Program command center is 800-554-5738. The EPA Region 6 24 hour emergency phone number is 866-372-7745 and Mr. Jim Brown's 24 hour number is 972-400-7638.

VI. Grants and Loans

A. Public Water Supply Supervision Grant Program

The ADH drinking water program received \$953,000 in PWSS funds for FY 2015 and as of February 4, 2015, all of these funds have been spent.

The tentative 2016 PWSS allocation amount of \$185,041.00, is based on a Continuing Resolution until December 11, 2015. The Agency's operating agreement is still under review and final allotments will be sent once it is approved. The application from the Arkansas Department of Health for 2016-2017 was received on June 18, 2015, and requested funding of \$953,000 for FY16.

The Public Water Supply Supervision (PWSS) Grant Workplan Guidance document has been put on hold until further notice. EPA staff is working with ADH to ensure that quantifiable measures are included in the workplan.

EPA Region 6 received the PWSS Progress Report for Federal Fiscal Year 2015 dated November 17, 2015. EPA appreciates the submission of the report and will ensure that the Progress Report is attached to EOY review report.

B. Drinking Water State Revolving Fund Set-Asides

ADH continues to work towards spending down the Drinking Water State Revolving Funds (DWSRF) set asides. The DWSRF Set-Aside Workplan details how much of these legacy unliquidated obligations (ULO) are expected to be drawn down, in addition to the funds received during the fiscal year. The Arkansas Natural Resources Commission (ANRC) ULOs are summarized in Table 8. The ULOs continue to be an issue due to the federal budget, and therefore ANRC is encouraged to draw down these funds for expenses in a timely manner.

EPA Region 6 staff is committed to assist ADH in reducing their ULOs and encourages innovative projects such as source water protection, capacity development, and sustainability of the ADH PWSS program whereby all projects will positively affects the citizens of the State of Arkansas.

EPA HQ is working on a DWSRF Eligibility Handbook to help states and EPA staff work through eligibility questions. ADH staff have given input already through previous eligibility requests to the Region, and have been asked to review it in detail when EPA Headquarters sends to states for comments later this year.

Every four years, EPA works with states and community water systems to estimate the DWSRF eligible needs of water systems by state by having systems complete the Drinking Water Infrastructure Needs Survey and Assessment. The assessment of need is for 20 years from the time of the survey. The assessment results in a report to Congress and is the basis for allotting DWSRF grant monies to states. At the time of the End of Year Review, ADH stated that approximately 57% of the surveys for the state have been completed.

Table 8

Arkansas Natural Resources Commission (ANRC) Unliquidated Obligations (ULO)

Grant Number	Date	Total Grant Amount	Small Systems (2%)	State Prgm (10%)	Local Asst (15%)	Project End Date
FS98600116	9/12/2013	\$12,743,000	N/A	\$0.00	\$372,960.31	9/30/2017
FS98600117	9/22/2014	\$13,526,000	N/A	\$1,146,162.12	\$2,008,323.40	9/30/2018
FS98600118	9/02/2015	\$13,445,000	N/A	\$1,344,500.00	\$2,016,750.00	9/30/2019
TOTAL			N/A	\$2,490,662.12	\$4,398,033.71	

Total ULO as of 12/2015	\$6,888,695.83
Total ULO as of 2/2015	\$7,231,453.55
Difference:	-\$342,757.72

EPA informed ADH of the quality assurance requirements that must be in place before any grants or funds are awarded. For ADH, the following quality assurance documents are on file:

QMP: Expires July 17, 2016 (Q-Track 15-356)

QAPP: Expires November 4, 2017 (Q-Track 15-064)

Quality assurance plans are due into EPA Region 6 at least 60 days prior to the expiration of the previously approved plan to allow for review and approval of the updated QA plan. However, if ADH expects substantial revisions that will be needed within the next year, it is suggested to have the plan approved for one year. For the QMP that expires on July 17, 2016, it is recommended that the new QMP be submitted to Mr. Don Johnson by May 2016.

VII. Data Systems

A. Program Update

The current software version for the Safe Drinking Water Information System (SDWIS) used by ADH is version 3.3 and FedRep version 3. Regarding the Compliance Decision Support (CDS) functions in SDWIS, ADH is determining compliance outside of SDWIS and the violations are entered manually back into SDWIS.

As EPA moves forward with the next generation of SDWIS (called SDWIS Prime) that will be built using the Oracle platform, ADH's legacy systems currently operates on the Structured Query Language (SQL) platform which may result in compatibility issues as ADH moves towards SDWIS Prime. The ADH data team continues to participate in Regional and National data conference calls regarding SDWIS Prime and SDWIS concerns.

As mentioned earlier in the laboratory section, laboratory results regarding total coliform results were taking much longer to report to the Engineering section due to reporting delays at the laboratory. This delay has now been addressed where laboratory results are being released in a timely manner allowing the ADH data team to process the results into their data systems to make prompt compliance determinations. The ADH data team is also working with the laboratory team to streamline the laboratory requisition process for total coliform samples by evaluating the use of smartphone applications that can prepopulate demographic information and create valid date stamps.

EPA Region 6 informed ADH that technical assistance for these data systems can be provided from the Regional data team such as training, performing system upgrades, or reviewing data handling procedures.

B. EPA Data Audit: Activities For Next Year

As a result of the July 2012 data audit, ADH has made efforts to address the need to have redundancy training for the ADH data team. ADH has written standard operating procedures for the drinking water program that details all of the program's reporting requirements. The standard operating procedures are reviewed annually and updated for new drinking water rules as they are implemented. For the next year, the standard operating procedure will be updated to reflect the data workflow processes of the Revised Total Coliform Rule and any new queries created.

VIII. Program Implementation

ADH has a continuous approach for implementing new drinking water regulations without any lapses. This policy of implementing new drinking water regulations is the primary reason the ADH PWSS program is ranked nationally as having one of the highest number and percentage of water systems in compliance with newly promulgated drinking water regulations. An example of this is when the State of Arkansas was the first state in Region 6 to receive primacy for the Revised Total Coliform Rule.

A. Source Water Protection

Source water protection work in Arkansas is currently contracted out to the United States Geological Survey (USGS) to perform the second upgrade to the Source Water Assessment Program (SWAP) model. Additional work from this contract includes the mapping of karst areas in the state to better determine ground water quality impacts.

Currently there are two openings in this area of the ADH program with an opening for a supervisor and an Environmental Health Specialist. These positions are scheduled to be filled by February 2016.

The EPA Region 6 point of contact regarding Source Water Protection activities is Mr. Miguel Moreno who can be contacted at 214-665-7296.

B. Total Coliform Rule (TCR) and Revised TCR

EPA has revised the 1989 TCR and the current rule remains until March 31, 2016. On April 1, 2016, the Revised TCR (RTCR) becomes effective and Arkansas water systems will begin complying with the RTCR requirements. The RTCR establishes a maximum contaminant level (MCL) for *E.coli* and uses *E.coli* and the total coliforms to initiate a "find and fix" approach to address fecal contamination that could enter into the distribution system. It requires public water systems to perform assessments to identify sanitary defects and subsequently take action to correct them.

EPA Region 6 received the final primacy application for the RTCR on February 9, 2015. On June 10, 2015, a *Federal Register* notice appeared in volume 80, number 111 (FRL-9929-02-Region 6) stating that the State of Arkansas has adopted the RTCR by reference and that EPA intends to approve the program revision package. An additional notice was also printed in the *Arkansas Democrat Gazette* on June 12, 2015. The final approval for the RTCR by EPA occurred on July 17, 2015.

For the RTCR Level 1 assessments, ADH staff will contact the water system when this assessment is triggered and track the progress of the assessment. The Level 2 assessments will be performed by ADH staff. In preparation for the RTCR sampling plans, ADH will review all sampling plans during upcoming sanitary surveys and make revisions as necessary to obtain representative distribution system monitoring.

ADH will provide additional outreach in early 2016 to bring awareness of this new upcoming rule to drinking water systems via the Winter Newsletter and the spring drinking water conference.

C. Ground Water Rule

The Ground Water Rule establishes a risk-based approach to target ground water systems that are vulnerable to fecal contamination. The rule is triggered when a ground water system that has a total coliform positive routine distribution system sample is advised of the ground water rule source water monitoring requirement. A source water sample is then collected and analyzed to determine if the total coliform positive may have come from the source.

Between October 1, 2014 and September 30, 2015, the following activities under the Ground Water Rule occurred in Arkansas:

218	Routine distribution system triggered events
284	Total Coliform Positive triggered samples
186	<i>E. coli</i> source water samples collected
2	<i>E. coli</i> triggered positive samples
19	Systems on 4-log treatment

D. Surface Water Treatment Rule with LT2

The purpose of the Long Term 2 Enhanced Surface Water Treatment Rule (LT2 Rule) is to reduce potential disease incidence associated with *Cryptosporidium* and other disease causing microorganisms in drinking water. ADH has seven systems that are categorized in Bin Classification 2 for the LT2 rule. These systems are summarized below in Table 9.

Table 9
ADH LT2 Systems and Compliance Option Initiated

System	Schedule	Compliance Option
Ft Smith – Lee Creek	2	Individual and Combined Filter Performance
Hot Spring Lakeside	2	Individual and Combined Filter Performance
Siloam Springs	3	Individual and Combined Filter Performance
Batesville	3	Individual and Combined Filter Performance.
Pocahontas	4	Individual and Combined Filter Performance
Clarksville – Piney Bay	4	Individual and Combined Filter Performance. Ozone contact as backup
Amity	4	Individual and Combined Filter Performance

The second round of LT2 monitoring for ADH water systems began in July 2014 and continues. ADH has a contract with BioVir/IEH laboratory to conduct the *Cryptosporidium* analyses. At the present time, 14 water systems have been triggered to conduct *Cryptosporidium* monitoring.

E. Consumer Confidence Reports (CCR)

The Consumer Confidence Reports requires public water suppliers that serve the same people year round to provide Consumer Confidence Reports (CCR) to their customers. These reports are also known as annual water quality reports or drinking water quality reports. In 2015, ADH was able to achieve a 95% compliance rate with only 15 water

systems that failed to submit a CCR.

To assist with the administrative issues and the increased cost of newspaper publication of the CCR, ADH offered a web based version of the CCR to systems that have no drinking water violations. To encourage more systems to use the web based reporting venue in 2016, ADH has begun outreach efforts in 2015 with additional trainings scheduled for January 2016.

The EPA Region 6 point of contact for CCRs is Mrs. Nichole Foster and she can be reached at 214-665-7248.

F. Unregulated Contaminant Monitoring Rule 3/4 (UCMR 3/4)

Arkansas was the only state in EPA Region 6 that directly implemented the Unregulated Contaminant Monitoring Rule 3 (UCMR 3). EPA greatly appreciates ADH's efforts to assist EPA's contractors to prepare monitoring schedules, sampling logistics, and the reporting of results. ADH water systems have now completed their monitoring for this program and are awaiting their final completion paperwork.

The next monitoring that will be conducted will be under UCMR 4. EPA published a *Federal Register* notice on December 11, 2015, about the proposed UCMR 4 that identifies 11 analytical methods to support water system monitoring for a total of 30 chemical contaminants consisting of 10 cyanotoxins; two metals; eight pesticides plus one pesticide manufacturing byproduct; three brominated haloacetic acid groups of disinfection byproducts; three alcohols; and three semivolatile organic chemicals. The five year UCMR 4 program would take place from January 2017 through December 2021.

G. Stage 2 Disinfectants and Disinfection Byproducts Rule (Stage 2 DBPR)

The Stage 2 Disinfectants and Disinfection Byproducts Rule (Stage 2 DBPR) is intended to reduce potential cancer and reproductive health risks from two groups of disinfection byproducts (trihalomethanes [TTHMs] and haloacetic acids [HAA5]) in drinking water. These disinfection byproducts form when disinfectants are used to control microbial pathogens.

In 2015, ADH issued 79 MCL violations regarding the Disinfection Byproducts Rule. 9 violations from this total were under the Stage 1 running annual average violations as water systems undergoing capital improvements were allowed 24 months for compliance. ADH has received 100 Operator Evaluation Level (OEL) reports from water systems and 56

of these reports have been approved. As a result of water systems exceeding the MCL for TTHMs and/or HAA5, 12 water systems were placed on increased monitoring.

As compliance is determined, ADH staff may refer a water system to the ADH AWOP program for disinfection byproduct control targeted technical assistance that can consist of additional process control monitoring, aeration strategies, or disinfection approaches.

H. Lead and Copper Rule

The lead and copper rule is designed to protect public health by minimizing lead and copper levels in drinking water, primarily by reducing water corrosivity. Lead and copper enters drinking water mainly from corrosion of lead and copper containing plumbing materials. Overall in 2015, ADH had a strong compliance rate for the Lead and Copper Rule with only two water systems that did not sample for this requirement and subsequently received monitoring and reporting violations.

Arkansas water systems are also aware of the Reduction of Lead in Drinking Water Act of 2011, which became effective on January 4, 2014. Plumbing vendors in the state have educated users of this Act and what to look out for.

When an Arkansas water system decides to change its source of water, the inventory is updated and the system is reviewed by the Lead Copper Supervisor. Systems undergoing a change of source water are typically placed on a new lead and copper monitoring plan to ensure that the new source is minimizing corrosion of plumbing components in the distribution system.

The EPA Region 6 point of contact for the lead and copper rule is Ms. Shirley Mlachak and she can be reached at 214-665-2267.

IX. Enforcement

The goal of this evaluation is to ensure that timely and appropriate State enforcement responses are taken where violations of drinking water regulations are found.

A. Program Review

The Arkansas enforcement program review was conducted in-person by EPA Region 6's Drinking Water Enforcement Program representative Ms. Tonia Biggs, along with ADH's enforcement coordinator, Ms. Robin Michaels.

During 2015, a focus area for the Region 6 enforcement program centered on small system compliance. The ADH process of returning small systems back into compliance consisted of issuing warning letters to the water system where these systems are usually back into compliance within 12 months. For systems that do not return to compliance, ADH then issues an administrative order. Should the administrative order not be successful, a consent order is then issued. In 2015, EPA Enforcement and ADH worked closely to amend ADH's processes of issuing Warning of Administrative Orders (WAO) by aligning the program more with EPA's need for water systems with a score of 11 or higher on the Enforcement Targeting Tool (ETT – a calculation method for determining a PWS's enforcement priority points that is used to help identify and prioritize systems for enforcement response) to be addressed within two quarters (six months) of being on the ETT list. ADH is still keeping their WAO process open for one year, but is issuing an order within six months if the water system has been on the ETT for two or more quarters.

Since ADH does not use an Oracle platform for its SDWIS data, EPA Enforcement will research whether the new ETT Assistant Tool can help ADH link and close violations toward improving ETT scores. Although room for improvements exists, ADH remains the best state in the Region in terms of compliance numbers.

For 2016, ADH stated that compliance with the TCR, RTRC, and Stage 2 DBPR will require more enforcement actions as water systems continue to have difficulty adhering to these regulations.

B. EPA Region 6 Enforcement Point of Contact for Arkansas

The EPA Region 6 primary enforcement point of contact is Ms. Tonia Biggs who can be reached at 214-665-8551 or biggs.tonia@epa.gov. The backup is Ms. Hannah Branning who can be reached at 214-665-7489 or branning.hannah@epa.gov.

C. Conclusion

Assistance provided by the ADH throughout the year is well appreciated by EPA Enforcement. EPA commends the hard work by ADH staff in responding to the citizens' complaints in a timely manner along with addressing violations on its ETT list.

X. Arkansas Drinking Water Updates

A. Storage Tank Management

In the State of Arkansas, full internal and external inspections of water storage tanks are to be conducted every five years in accordance with American Water Works Association Manual M42. Arkansas water systems cannot inspect their own tanks.

B. Minimum Disinfection Residual

The minimum disinfection residual for water systems in the State of Arkansas is a trace. It is recommended that systems maintain a 0.2 mg/L residual. For water systems disinfected with chloramines, monitoring of monochloramine is not required.

C. Harmful Algal Blooms

Algal blooms occur in natural waters used for drinking and/or recreation when certain types of microscopic algae grow quickly in water, often in response to changes in levels of chemicals such as nitrogen and phosphorous from fertilizer, in the water. Algal blooms can deplete the oxygen and block the sunlight that other organisms need to live, and some can produce toxins that are harmful to health and the environment.

The state is a low risk for experiencing algal blooms. However, monitoring of recreational beaches does occur on a routine basis from the USGS and Army Corps of Engineers. A workgroup on cyanotoxins has been formed consisting of members from Arkansas Department of Environmental Quality, Central Arkansas Water, Arkansas Game and Fish Commission, and USGS.

When a water system determines that there may be a harmful algal bloom impacting a drinking water intake, ADH has the ability to perform field testing for microcystins using the Abraxis Enzyme-Linked Immunosorbent Assay (ELISA).

XI. Conclusions

EPA Region 6 appreciates the continued assistance that ADH has provided to the Drinking Water Section over the past year regarding citizen inquiries, participation in EPA Region 6 AWOP activities, sharing of technical insights regarding instrument calibrations, and assisting with the development of the distribution system comprehensive performance evaluation.

EPA Region 6 applauds ADH for being the first state in the Region to adopt the RTCR, addressing concerns and special requests immediately upon notification, and the continued commitment to fiscal responsibility. For 2016, EPA Region 6 will have quarterly conference calls with ADH to discuss drinking water related matters, grant and funding updates, and potential partnerships and training opportunities between EPA and ADH.

ATTACHMENT A
The Approved Primacy Program

WSG 54 Requirement § 142.10

Number	Requirement	Meeting Standard
1	<i>Adoption of drinking water regulations which are no less stringent than the national primary drinking water regulations (NPDWRs) in effect. [40 C.F.R. 141.10(a)]</i>	Yes
2	<i>Maintenance of an inventory of public water systems. [40 C.F.R. 142.10(b)(1)]</i>	Yes
3	<i>Systematic program for conducting sanitary surveys of public water systems in the State, with priority given to sanitary surveys of public water systems not in compliance with State drinking water regulations. [40 C.F.R. 142.10(b)(2)]</i>	Yes
4	<i>Establish and maintain a State program to certify laboratories conducting analytical measurements of contaminants identified in State primary drinking water regulations. Designate a laboratory officer or officers certified by the Administrator that are responsible for the State's certification program. [40 C.F.R. 142.10(b)(3)]</i>	Yes
5	<i>Assurance of the availability of certified State laboratory facilities capable of performing analytical measurements of all contaminants specified in the State's primary drinking water regulations. [40 C.F.R. 142.10(b)(4)]</i>	Yes
6	<i>Establish and maintain activities to assure that the design and construction of new or substantially modified public water system facilities will be capable of compliance with the State primary drinking water regulations. [40 C.F.R. 142.10(b)(5)]</i>	Yes
7	<i>Has adequate authority to apply State primary drinking water regulations to all public water systems in the State covered by NPDWRs. [40 C.F.R. 142.10(b)(6)(i)]</i>	Yes
8	<i>Has the adequate authority to sue in courts of competent jurisdiction to enjoin any threatened or continuing violation of State regulations. [40 C.F.R. 142.10(b)(6)(ii)]</i>	Yes
9	<i>Right to enter and inspect public water systems, including the right to take water sample, whether or not the State has evidence that the system is in violation of an applicable legal requirement. [40 C.F.R. 142.10(b)(6)(iv)]</i>	Yes
10	<i>Authority to require suppliers of water to keep appropriate records and make appropriate reports to the State. [40 C.F.R. 142.10(b)(6)(iv)]</i>	Yes

ATTACHMENT A
The Approved Primacy Program

WSG 54 Requirement § 142.10

Number	Requirement	Meeting Standard
11	<i>Authority to require public water systems to give public notice that is no less stringent than EPA requirements in § 142.32 and 142.16(a). [40 C.F.R. 142.10(b)(6)(v)]</i>	Yes
12	<i>Authority to assess civil or criminal penalties for violation of the State's primary drinking water regulations and public notification requirements, including the authority to assess daily penalties or multiple penalties when a violation continues. [40 C.F.R. 142.10(b)(6)(vi)]</i>	Yes
13	<i>Has established and will maintain recordkeeping of its activities under paragraph § 142.10(a), (b) and (d) in compliance with § 142.10 and 142.15. [40 C.F.R. 142.10(c)]</i>	Yes
14	<i>If it permits variances or exemptions, or both, from the requirements of the State primary drinking water regulations, it shall do so under conditions and in a manner no less stringent than the requirements under sections 1415 and 1416 of the Act. [40 C.F.R. 142.10(d)]</i>	No variances or exemptions in Arkansas
15	<i>Has adopted and can implement an adequate plan for the provision of safe drinking water under emergency circumstances. [40 C.F.R. 142.10(e)]</i>	Yes

The state of Arkansas continues to meet all of the 15 elements for primacy to implement the Safe Drinking Water Act.

ATTACHMENT B
Quarterly Meeting Notes with ADH and EPA R6

AGENDA

Quarterly Arkansas Conference Call with EPA

Tuesday, March 17, 2015

10 AM CST

1-866-299-3188 and the conference code is 214-665-8088

EPA Attendees: Shirley Mlachak, Nichole Foster, Mark McCasland, Jatin Mistry, Ashley Howard, José Rodriguez, Blake Atkins

ADH Attendees: Jeff Stone, Lance Jones, Lyle Godfrey, Amelia Trimble, Robin Michaels, Martin Nutt, David Bradley, Teresa Lee

1. Staffing Updates

- ADH staffing updates
 - i. Open District Engineer Specialists positions
 - 1. District 4 specialist retiring soon
 - 2. District 6 specialist
 - ii. One administrative staff member on maternity leave
- EPA staffing updates
 - i. Mr. Jim Brown will become the permanent Associate Director of the Source Water Protection Branch officially on March 23. This position was previously held by Ms. Stacy Dwyer.
 - ii. The Associate Director for the Assistance Programs Branch is Ms. Claudia Hosch and can be reached at 214-665-6464.
 - iii. Mr. Mark McCasland will be the Drinking Water Section's point of contact for drinking water security questions. Ms. Dawn Ison has taken a position with EPA in Cincinnati, Ohio.

2. PWSS/SRF

- Funding update and ULO
 - i. There is a delay of one more week before funding can be finalized by EPA.
 - ii. A request was received by EPA asking if capacity development funds can be utilized to purchase a disk array storage system for GIS data under the well head protection program.
- Laboratory equipment needs for drinking water
 - i. There is a yellow paper document that is referenced regarding the utilization of funds for laboratory items and consumables. EPA will follow up on this document.
- Contract update for *Cryptosporidium* testing
 - i. ADH is currently in month 8 of this contract.

- ii. ADH is considering extending this analytical contract in 2016.
 - QMP
 - i. This document expires on July 28, 2015
 - ii. ADH will provide a QMP for review to EPA in June 2015.
 - EPA will follow up with ADH on what basis is used for the PWS Supervision Grant allocation amount.
3. Capacity Development
- Update on small system assistance from Arkansas Rural Water (ARW)
 - i. ADH recently met with ARW to discuss assistance programs.
 - ii. ARW will focus on board member training to provide an understanding of the responsibilities.
 - Drinking Water Operator certification in Arkansas
 - i. Some progress is being made for Drinking Water Operator certification, but it is not fast enough.
 - ii. Currently two rounds of exam have occurred (SEPT and OCT 2014).
 - iii. Breakdowns of the different parts of the exam are as follows:
 - 1. Distribution III – No passing data
 - 2. Small System – 75% passing rate
 - 3. Treatment II – 9 passing
 - iv. Overall passing rate currently stands at 31%.
 - v. An article in the Spring 2015 newsletter will discuss the Drinking Water Exams and their level of difficulty.
4. Enforcement
- Beulah Grove Water has been inactivated and now absorbed by El Dorado Water.
 - The ADH Board of Health has set hearings for 4 water systems for Thursday, March 26.
5. Data
- ADH will implement a procedural change regarding the Revised Total Coliform Rule that will allow for more timely notification of data from the laboratory to the ADH Engineering staff. This will allow ADH Engineering to receive results faster and make determinations such as the triggering of assessments (Level 1 or Level 2) and follow up requirements.
 - SDWIS
 - i. ADH was asked to review if all compliance schedules have been uploaded to EPA FED.

6. Drinking Water

- CCR Update
 - Many more systems are inquiring about electronic CCRs.
 - ADH anticipates about 50% of the systems going to electronic CCRs.
 - EPA Region 6 will work with ADH to confirm if certification forms can be submitted electronically.
- Number of Sanitary Surveys
 - i. Since July 1, 2014, ADH has completed 207 sanitary surveys and has scheduled around 169-170 to be completed by the end of fiscal year.

7. ADH Discussion Items

- ADH requested guidance regarding the new PWSS workplan format.
- EPA will work with ADH regarding SharePoint access issues.

8. Assistance from EPA Region 6

- No assistance was requested from EPA Region 6 at this time regarding sanitary survey and data training.

9. The Next Quarterly Arkansas Conference Call with EPA will be on Tuesday, June 16, 2015.

ATTACHMENT B
Quarterly Meeting Notes with ADH and EPA R6

AGENDA

Quarterly Arkansas Conference Call with EPA

Tuesday, June 16, 2015

10 AM CST

1-866-299-3188 and the conference code is 214-665-8088

EPA Attendees: Jatin Mistry, Mark McCasland, Andy Waite, Amy Camacho,
Zakiya Davis, Blake Atkins

ADH Attendees: Jeff Stone, Lance Jones, Lyle Godfrey, Amelia Trimble, Robin
Michaels, David Bradley, Greg Treadway, Teresa Lee

1. Staffing Updates

- ADH staffing updates
 - i. Hired Mr. Jason Gilke for the District 6 position.
 - ii. Jim Barlow has retired as the District 4 Environmental Health Specialist.
 - iii. Mr. Kyle Phillips (SWTR and GWUDI Determinations) is retiring at end of June and his duties will be re-distributed among staff. This vacancy will be used to add an additional Engineering Technician for sample collection where Susan Corder will now have 6 samplers.
 - iv. An additional sample collection position (held by Ms. Martha West) will be open.
 - v. The hiring process for these sample collection positions are planned be closed by mid to late August.
 - vi. ADH is focusing on the sample collection positions as a result of the additional sampling requirements for the Stage 2 DBPR.
- EPA staffing updates
 - i. Mr. Gregory Parrish is the point of contact for PWSS funding.
 - 1. Gregory Parrish (214-665-6586)
 - 2. Parrish.gregory@epa.gov
 - ii. Mr. Ruben Camacho is the point of contact for SRF funding.
 - 1. Ruben Camacho (214-665-7599)
 - 2. Camacho.ruben@epa.gov
 - iii. The drinking water section may be able to hire one position from a recent new graduate employment announcement in the Region.

2. PWSS/SRF

- Funding update
 - i. Ms. Amelia Trimble has submitted the ADH work plan to grants.gov. The system has allowed for the grant to be submitted.
 - ii. A paper copy of the document has been signed and also submitted to EPA Region 6.
 - iii. ADH is awaiting confirmation from Mr. Parrish if the document was received on EPA's side.
 - iv. FY15 grant will be submitted by ANRC by the end of the month.
- Additional equipment needs for drinking water program
 - i. FY16 grant application has requests for two more pieces of drinking water analytical laboratory equipment.
 - ii. Computer servers that host ADH drinking water data are going out of warranty and need to be replaced. ADH will work with the grants team on potential funding approaches to purchase new servers.
- QMP Expiration July 28, 2015
 - i. The ADH QMP will be signed by the end of this week.
 - ii. EPA will need to follow up with ADH on who to send the completed QMP document to.
- Needs Survey
 - i. EPA has launched the 2015 Drinking Water infrastructure Needs Survey and Assessment.
 - ii. Webinar update and training refresher scheduled for June 22 at 1 PM EST.
 - iii. Survey deadline is February 29, 2016.
 - iv. ADH has not scheduled their training for the Needs Survey as of yet. Looking to have this training within the next month.
 - v. Funding for the Needs Survey was captured in the FY14 workplan, but any increases in the training cost will need to be placed on ANRC's FY15 Set Asides.

3. Capacity Development

- The passing rate from July 2014 to present is about 42%.
- Still have a low passing rate for the higher level exams (Level 3 and 4).
- 175 exams were recently given by the ADH program.

4. Enforcement

- Ms. Zakiya Davis discussed the current ADH approach in issuing Warning of Administrative Order (WAO). The ADH Enforcement timeline from WAO to formal actions is currently greater than six months.

- EPA considers WAO as informal actions which does not lower ETT scores.
- Ms. Zakiya Davis will work with ADH Enforcement on approaches where a formal order can be issued within 6 months instead of a WAO.
- Ms. Zakiya Davis will provide some written examples for ADH to use regarding the issuance of formal orders.

5. Data

- The ADH standard operating procedures for SDWIS activities will be updated based on the addition of new rules to SDWIS, new SDWIS versions, and other program updates.
- The next document update will occur when the RTCR will be implemented in Arkansas.
- Laboratory Data Communication
 - i. The laboratory data team person has returned to their previous lab position which will allow better data communication between the laboratory and engineering sections.

6. Drinking Water

- CCR Update
 - o About 1/3 electronic CCRs have been submitted and certified.
 - o This represents about 40-50% of the state's CCRs.
 - o The training approach that helped was attending evening district meetings and having direct communication with operators about the availability of electronic CCRs.
- Number of Sanitary Surveys completed so far
 - i. Since July 2014 to present, about 277 finalized with another 90-100 to be completed.
- Revised Total Coliform Rule training scheduled for August 20, 2015.

7. ADH Discussion Items

- Arkansas had a wet spring and is having an early summer
- Arkansas is entering the summer with their lakes at full capacity.

8. Assistance from EPA Region 6

- No assistance is requested from EPA Region 6 at the moment.

9. The Next Quarterly Arkansas Conference Call with EPA will be on Tuesday, September 22, 2015.

ATTACHMENT B
Quarterly Meeting Notes with ADH and EPA R6

AGENDA

Quarterly Arkansas Conference Call with EPA

Tuesday, September 22, 2015

10 AM CST

1-866-299-3188 and the conference code is 214-665-8088

José Rodriguez, Tonia Biggs

Jeff Stone, Lance Jones, Lyle Godfrey, Amelia Tremble, Greg Treadway,
David Bradley, Martin Nutt, Teresa Lee, Robin Michaels

1. Staffing Updates

- ADH staffing updates
 - i. There have been recent staffing changes in the sampling team due to retirements and other job offers.
 - ii. The current sampling team consists of four members and ADH is trying to obtain an additional position for a total of five members.
 - iii. One administration employee retired.
 - iv. The District 4 Environmental Specialist position is currently open.
- EPA staffing updates
 - i. The EPA Region 6 Drinking Water Section Chief, Blake Atkins, last day was September 20.
 - ii. José Rodriguez is the acting section chief for the next 30 days.
 - 1. Email: Rodriguez.jose@epa.gov
 - 2. Phone: 214-665-8087
 - iii. After the next 30 days, Jim Brown will assign another acting section chief.
 - iv. The Drinking Water Section will have a new Engineering hire that is expected to start no later than October 30, 2015.
 - v. Tonia Biggs is the new enforcement coordinator for Arkansas and has replaced Keya Davis.
 - 1. Email: biggs.tonia@epa.gov
 - 2. Phone: 214-665-8551

2. PWSS/SRF

- Funding update
 - i. There is the possibility of a continuing resolution should a full budget not be passed by September 30. The continuing resolution will use last year's allocation amounts.

- ii. Arkansas has submitted all required documentation to the EPA's grant office and is awaiting disbursement of funds.
- iii. Confirmation is needed from the grants team on what documentation is needed for quarterly and annual reports from Arkansas regarding the PWSS. *ACTION ITEM: Jatin will follow up with Greg Parrish on what documentation will suffice for this action.*
- Additional equipment needs (laboratory/computer) for drinking water program
 - i. Two pieces of laboratory equipment have received EPA approval for purchase which consists of a gas chromatograph and mass spectra.
- QMP's new expiration date is July 17, 2016.
- Needs Survey progress
 - i. 22% of the needs survey have been completed for Arkansas.
 - ii. Cadmus reports that 20% of the surveys submitted to date have come from Arkansas.

3. Capacity Development

- Current operator exam passing rate
 - i. The operator exam passing rate is still low and trainers are adjusting their teaching methods to address this need. Reports generated from the exam list categories and mastering levels that trainers can use to enhance the trainings.
 - ii. The overall passing rate is 25 to 30%.
 - iii. The number of operator training classes have been reduced due to the limited number of trainers and classes are not offered as frequently as before.

4. Enforcement

- WAOs and ADH enforcement escalation policy
 - i. EPA Region 6 discussed with ADH their WAO process timelines and ADH's enforcement escalation policy.
 - ii. A phone call was held with ADH to further discuss WAOs. Items discussed were the length of WAOs and the need to execute formal enforcement actions within 6 months of a facility over 11 points on the ETT.
 - iii. So long as formal enforcement actions occurs within 6 months of a facility over 11 points on the ETT, this meets the requirements of the EPA's Enforcement Response Policy.
 - iv. These enforcement actions will also be documented in SDWIS State.
 - v. ADH will submit a response letter to EPA further discussing the ADH enforcement escalation policy.

- Current ETT
 - i. Arkansas is currently ranked best in the Region on addressing its ETT list.
5. Data
- ADH data standard operating procedures written for the RTCR
 - i. Arkansas has recently updated SDWIS to version 3.3.
 - ii. As testing under version 3.3 continues, the standard operating procedure will be updated to include the RTCR modules.
 - Laboratory data communication team update
 - i. Communication with the laboratory data team is ongoing.
 - ii. The laboratory has had staffing changes due to retirements and backfilling of these positions is taking time. As a result of this, minor delays in reporting laboratory results to the engineering team are occurring.
6. Drinking Water
- CCR
 - o 85% of the CCR reports in Arkansas have been certified.
 - o 1/3 of Arkansas PWS published their CCRs on the ADH website.
 - o ADH will continue its CCR outreach effort this winter to educate water systems on the electronic CCR.
 - Number of Sanitary Surveys completed so far
 - i. For calendar year 2015, 160 surveys have been completed.
 - ii. For fiscal year 2015, 214 surveys have been completed.
 - Revised Total Coliform Rule training
 - i. EPA will provide training to ADH and assistance providers for the RTCR on September 24.
7. ADH Discussion Items
- Are there any active mines in Arkansas that are discharging into drinking water source waters such as the Gold King Mine in Colorado?
 - i. Arkansas does not have active mines that are discharging into drinking water sources.
 - ii. The mining activities consist of tailing ponds near the lower Ouachita River from vanadium mines.
8. Assistance from EPA Region 6
- Funding guidance
 - i. ADH has submitted all required funding documents to EPA for the next fiscal year.

- ii. ADH does have carry over funds should a lapse in federal funding occur due to a normal shutdown.
- 9. The Next Quarterly Arkansas Conference Call with EPA will be the End of Year Discussions in person at the Arkansas Department of Health Office that will take place on Tuesday, December 15, 2015 from 9 AM to 4 PM.

ATTACHMENT B
Quarterly Meeting Notes with ADH and EPA R6

AGENDA

Special Arkansas Conference Call with EPA

Wednesday, September 30, 2015

1 PM CST

1-866-299-3188 and the conference code is 214-665-8088

Ruben Camacho, Greg Parrish, Jatin Mistry
Jeff Stone, Amelia Trimble, Lyle Godfrey, Lance Jones

1. PWSS/SRF

- Funding update
 - i. There is the possibility of a continuing resolution should a full budget not be passed by September 30. The continuing resolution will use last year's allocation amounts.
 - 1. The continuing resolution will provide funding till December 11.
 - 2. ADH will receive a small percentage of their PWSS grant funds during the continuing resolution time period.
 - 3. ADH stated that they can borrow against their Agency's liquidity for the short term.
 - 4. If funds are needed immediately, ADH was advised to send an email request to the following EPA Grants Team Members:
 - a. Maurice Rawls: 214-665-8049 or rawls.maurice@epa.gov
 - b. Gregg Parrish: 214-665-6586 or parrish.gregory@epa.gov
 - c. Ruben Camacho: 214-665-7599 or Camacho.ruben@epa.gov
 - ii. Arkansas has submitted all required documentation to the EPA's grant office and the next step is the disbursement of funds.
 - iii. Confirmation is needed from the grants team on what documentation is needed for quarterly and annual reports from Arkansas regarding the PWSS and SRF deliverables.
 - 1. In the past, EPA Region 6 quarterly conference call notes and the yearly Arkansas End of Year Report would suffice as quarterly and annual grant reports.

- | | |
|----|---|
| 3. | A discussion was held regarding what timeline should be followed regarding deliverables: Either the Arkansas State Fiscal year (August 1 to July 31) or the Federal Fiscal year (October 1 to September 30). |
| a. | Mr. Camacho and Mr. Parrish will meet with Mr. Rawls regarding how best to document the ADH grant deliverables for quarterly and yearly reports along with determining what time span to follow (state fiscal year or federal fiscal year). |
| b. | EPA will follow up with ADH on its guidance regarding these reports. |

ATTACHMENT C
Primacy Revision & Program Update for ADH
(Revised 12/23/2015)

Rule	Draft Primacy Revision Application		State Adoption		Final Primacy Revision Application		Final EPA Approval	
	Status	Date	Status	Date	Status	Date	Status	Date
IESWTR	Actual	12/00	Adopted	07/99	Actual	10/01	Approved	04/10/02
Stage 1 DBPR	Actual	12/00	Adopted	07/99	Actual	10/01	Approved	04/10/02
CCR Rule	Actual	01/00	Adopted	07/99	Actual	12/00	Approved	11/01
Variance and Exemption Rule	Actual	02/02	Adopted	07/99	Actual	09/02	Approved	09/03
New PWS Definition	Actual	01/00	Adopted	07/99	Actual	12/00	Approved	11/01
Administrative Penalty Authority	NA	NA	Adopted	02/91	Actual	12/00	Approved	11/01
Lead and Copper Rule Minor Revisions	Actual	12/01	Adopted	01/02	Actual	12/01	Approved	09/03
Public Notification Rule	Actual	02/02	Adopted	01/02	Actual	09/02	Approved	09/03
Arsenic	Actual	09/02	Adopted	01/02	Actual	12/02	Approved	09/03
Radiological Rule	Actual	09/02	Adopted	01/02	Actual	09/02	Approved	09/03
Filter Backwash Rule	Actual	06/03	Adopted	01/02	Actual	06/03	Approved	09/03
LT1 Rule	Actual	01/04	Adopted	01/04	Actual	01/04	Approved	06/04
Stage 2 DBPR	Actual	12/07	Adopted	01/07	Actual	12/07	Approved	05/08
LT2 Rule	Actual	12/07	Adopted	01/07	Actual	12/07	Approved	05/08
GWR	Actual	11/08	Adopted	11/07	Actual	11/08	Approved	05/13/09
Pb & Cu Minor Revisions	Actual	5/09	Adopted	11/07	Actual	08/10/09	Approved	12/18/09
Revised Total Coliform Rule	Actual	10/14	Adopted	02/15	Actual	02/09/15	Approved	07/17/2015

ATTACHMENT C (Continued)
Primacy Revision & Program Update for ADH
 (Revised 12/23/2015)

Program Area	Deadline for EPA Final Approval	Draft program Submitted		Final Program Approval	
		Projected	Actual	Projected	Actual
Capacity Development- Existing Systems	08/06/2000	07/2000	07/2000	09/2000	08/11/2000
Operator Certification	02/05/2001	08/2000	01/31/2001	02/2001	03/2001

ATTACHMENT D
Performance Annual Measures (PAM)

PAMs

PERIOD: 07/01/2014 THRU 06/30/2015

Data pulled from Headquarters October 2015 NMP Pivot tables

Code	Measure	Goals		EPA Region 6	Arkansas (ADH)
		FY	GOAL		
211	Water Safe to Drink: Percentage of the population served by community water systems that receive drinking water that meets all applicable health-based drinking water standards through effective treatment and source water			83.3%	87.7%
		11	87.0%		
		12	85.0%		
		13	85.0%		
		14	85.0%		
		15	.0%		
SP-1	Percentage of the community water systems that provide drinking water that meets all applicable health-based drinking water standards through effective treatment and source water			83.8%	81.8%
		11	85.0%		
		12	85.0%		
		13	85.0%		
		14	85.0%		
		15	.0%		
SP-2	Percentage of "person months" during which community water systems provide drinking water that meets all applicable health-based drinking water standards			92.9%	95.5%
		11	94.0%		
		12	94.0%		
		13	94.0%		
		14	94.0%		
		15	.0%		

ATTACHMENT D (Continued)
Performance Annual Measures

Comparison of results over the last 4 “rolling 4-quarter” periods for CWS % population (Measure 2.1.1) and % systems (Measure SP-1) in compliance with all health based standards				
Period Covering	R6		AR	
	% POP	% SYS	% POP	% SYS
7/1/2014 – 6/30/2015	83.8%	83.9%	87.7%	81.8%
4/1/2014 – 3/31/2015	90.1%	84.5%	87.7%	82.1%
1/1/2014 – 12/31/2014	90.2%	84.6%	88.9%	83.7%
10/1/2013 – 9/30/2014	89.6%	85.3%	90.8%	84.8%

ATTACHMENT D (Continued)
Performance Annual Measures

Comparison of Sub objective SP-2 results over the last 6 "rolling 4-quarter" periods for Percentage of "Person Months" during which CWS are in compliance with all health based standards		
Period Covering	Region 6	Arkansas
7/1/2014 - 6/30/2015	92.9%	95.5%
4/1/2014 – 3/31/2015	94.7%	95.8%
1/1/2014 – 12/31/2014	95.6%	97.1%
10/1/2013 – 9/30/2014	95.6%	96.4%

Attachment E

Number of Systems in Violation in Arkansas During FY 2015

Number of Systems in Violation in Arkansas During FY 2015
(October 1, 2014 thru September 30, 2015 as of January 11, 2016)
(Small <= 3,300; Medium: 3,301 - 10,000; Large >10,000)

MCL, TT, and MRDL Violations (Health Based Standards)		Community			Non-Transient Non-Community			Transient Non-Community			Total
		Small	Medium	Large	Small	Medium	Large	Small	Medium	Large	
Phase II/V	IOC				2						2
Disinfection By-Products Rule	Stg2	26	4	3	2						35
	Stg1	25	3		1						29
Surface Water Treatment Rules	SWTR	2		1				3			6
	LT1	1		1				1			3
Lead and Copper Rule		2									2
Ground Water Rule		1						1			2
Total Coliform Rule		63	8	5	4			11			91
M and R and Consumer Notification Violations		Community			Non-Transient Non-Community			Transient Non-Community			Total
		Small	Medium	Large	Small	Medium	Large	Small	Medium	Large	
Disinfection By-Products Rule	Stg1	7	2								9
Surface Water Treatment Rules	SWTR	1		1				7			9
	LT1	2						6			8
	LT2							1			1
Lead and Copper Rule		19			1						20
Ground Water Rule		17						17			34
Total Coliform Rule		69	9		4			80			162
Consumer Notification	CCR	50	6					1			57
	PN	46	4		3			51			104

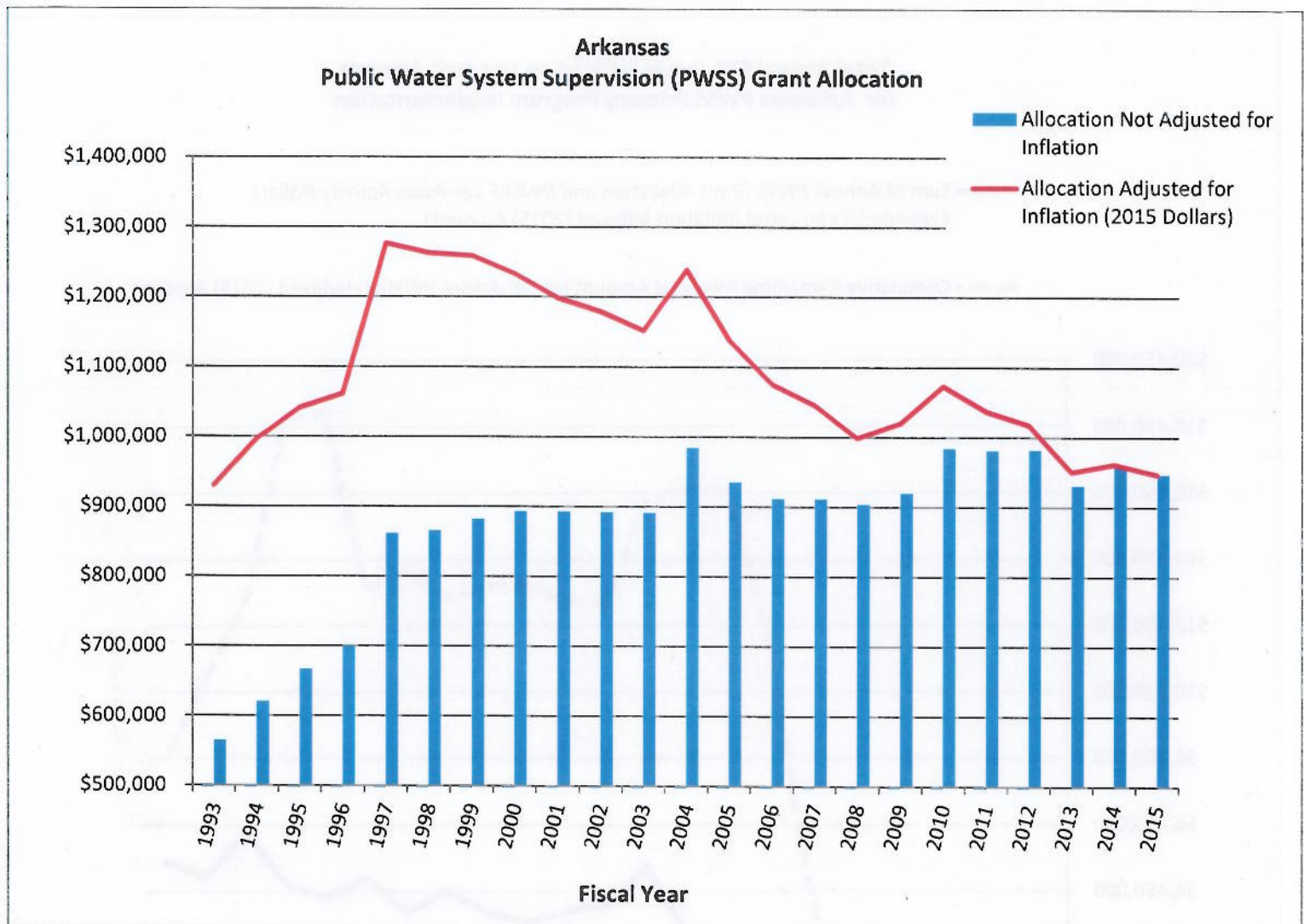
Number of Violation in Arkansas During FY 2015
(October 1, 2014 thru September 30, 2015 as of January 11, 2016)
(Small <= 3,300; Medium: 3,301 - 10,000; Large >10,000)

MCL, TT, and MRDL Violations (Health Based Standards)		Community			Non-Transient Non-Community			Transient Non-Community			Total
		Small	Medium	Large	Small	Medium	Large	Small	Medium	Large	
Phase II/V	IOC				2						2
Disinfection By-Products Rule	Stg2	61	7	6	5						79
	Stg1	97	22		1						120
Surface Water Treatment Rules	SWTR	3		1				11			15
	LT1	1		1				1			3
Lead and Copper Rule		4									4
Ground Water Rule		2						1			3
Total Coliform Rule		79	8	6	5			14			112
M and R and Consumer Notification Violations		Community			Non-Transient Non-Community			Transient Non-Community			Total
		Small	Medium	Large	Small	Medium	Large	Small	Medium	Large	
Disinfection By-Products Rule	Stg1	7	2								9
Surface Water Treatment Rules	SWTR	1		1				26			28
	LT1	2						18			20
	LT2							2			2
Lead and Copper Rule		33			1						34
Ground Water Rule		19						26			45
Total Coliform Rule		99	9		5			134			247
Consumer Notification	CCR	105	11					2			118
	PN	105	7		5			124			241

Attachment F
Arkansas Top 50 Systems in Violation by Population
October 1 2014 to September 30, 2015

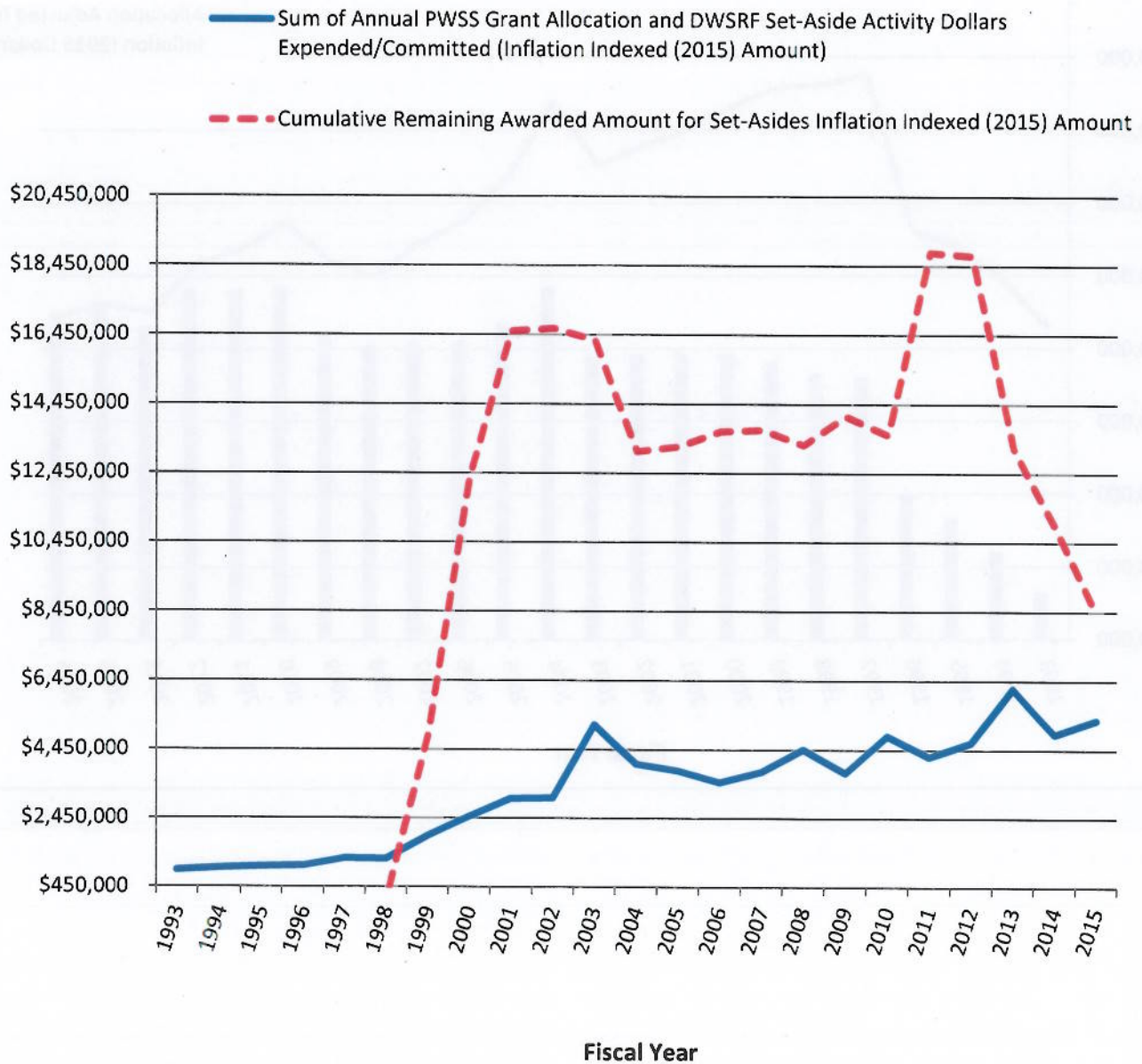
Arkansas Top 50 Systems in Violation by Population 10/01/2014 thru 09/30/2015				Stg1 DBPR				Stg2 DBPR	SWTR		LT1	TCR		PN	CCR
Pop	PWSID	System Name	Sec	Total MR	Carbon TT	Chlorine MR	Stg1 TT	MCL TTMM	MR	TT	IESWTR TT	MCL TCR	MR	MR	MR
37735	AR0000119	Conway Co Regional Water Dist	SW									1			
32097	AR0000360	Texarkana Water Utilities	SW					1	1						
29629	AR0000574	Washington Water Authority Wwa	SWP					1							
28000	AR0000156	West Memphis Waterworks	GW									2			
27000	AR0000738	Grand Prairie Regional Water	GW									1			
23177	AR0000195	Vilonia Waterworks	SWP									1			
17299	AR0000782	Tri-County Water Distbr Dist	SW					4							
16577	AR0000056	Silosm Springs Waterworks	SW							1					
10956	AR0000077	Green Forest Waterworks	SWP									1			
10708	AR0000144	Alma Waterworks	SW								1				
9288	AR0000289	Clarksville Waterworks	SW									1			
7777	AR0000438	Mena Water Department	SW									1			
6958	AR0000805	Nashville Rural Water Assoc	SWP					1							
6209	AR0000572	Lincoln Waterworks	SWP									1	1		
6020	AR0000147	Concord Water & Sewer Pfb Of Crawford Co	SWP											3	3
5955	AR0000697	Ne Yell County Water Assoc	SWP									1			
5828	AR0000082	Dermott Waterworks	GW				17							1	2
5430	AR0000301	Hoxie Water Department	SWP			1							1		
5309	AR0000015	Hamburg Waterworks	GW										1		
5123	AR0000326	Pans Waterworks	SW												2
5020	AR0000313	Lee County Water Association	GWP					1							
4746	AR0000164	Fordyce Water Co	GW												2
4288	AR0000201	Ozark Waterworks	SW	1											
4250	AR0000787	Little River Co Rda	SW		4										
4238	AR0000512	Barling Waterworks	SWP										1		
4200	AR0000384	Brinkley Waterworks	GW					3							
4108	AR0000445	Pottsville Water Association	SWP										1		
4077	AR0000498	Waldron Waterworks	SW				1								
3901	AR0000033	North East Public Water Auth	SWP									1			
3883	AR0000003	Calico Rock Waterworks	GU									1	1		
3800	AR0000315	Adc - Cummins Unit Maint	GW											1	1
3695	AR0000288	Lamar Waterworks	SWP									1			
3628	AR0000773	Milltown-Washburn Water Users	SWP					2							
3452	AR0000636	Frenchport Water Association	SWP										1		
3428	AR0000510	Lavaca Waterworks	SWP									1			
3377	AR0000096	Corning Waterworks	GW										1	2	1
3326	AR0000078	Holiday Island Waterworks	GW										1		
3300	AR0000580	Pangburn Waterworks	SW										1	3	
3241	AR0000251	Pfeiffer Water Authority	SWP										1		
3162	AR0000462	Bee Branch Water	SWP										1		
3072	AR0000332	Winslow Waterworks	SWP										1		
3067	AR0000392	Mount Ida Waterworks	SWP					3					1	1	
2929	AR0000206	Mammoth Spring Waterworks	GW										1		
2897	AR0000584	Bald Knob Waterworks	SWP			1									
2842	AR0000318	Star City Waterworks	GW									2			1
2583	AR0000223	Breckenridge Union Water Assoc	GW										1		3
2567	AR0000603	Danville Waterworks	SW							1					
2507	AR0000765	Hwy 424 Water Association	SWP					4							
2482	AR0000836	St Francis River Reg Water Dd	GW									1			
Number of Violations				1	4	2	18	20	1	2	1	17	16	11	15
Number of Systems in Violation				1	1	2	2	9	1	2	1	15	16	6	8

ATTACHMENT G
Arkansas Public Water System Supervision Grant Allocation



ATTACHMENT H
Annual EPA Funds Utilized vs Unspent Amount for Arkansas

**Total Annual EPA Funds Utilized vs Unspent Amount
for Arkansas PWSS Primacy Program Implementation**



ATTACHMENT I
ADH PWSS FY 2015 Program Review
Follow-Up Action Items

ACTION ITEM	RESPONSIBILITY	COMPLETE
Address ADH laboratory capacity and continued support	ADH	Follow up with ADH by quarterly conference call
Provide assistance to ADH regarding SDWIS upgrades	EPA Region 6 (Mark McCasland and Andy Waite)	Follow up with ADH by quarterly conference call
Check status of ADH's data redundancy training and annual SOP update	ADH	Follow up with ADH by quarterly conference call
Discussion of SDWIS Prime and Utilization of SDWIS Prime for ADH	ADH	Follow up with ADH by quarterly conference call
Provide information to ADH regarding future webinars or presentations provided by EPA HQ	EPA	Follow up with ADH by quarterly conference call or by E-mail
Provide deadlines for all regulatory requirements respective to Region 6 associated grant funding	EPA Region 6 Grants	Follow up with ADH by quarterly conference call
Continue to have quarterly phone calls with ADH Drinking Water Management	ADH	Jatin will coordinate the quarterly ADH conference call
Remind ADH that the current QMP expires on July 17, 2016 and will need to submit document by May 2016	ADH	Follow up with ADH by quarterly conference call
Remind ADH that the annual grant progress report will need to be submitted by December 30, 2016	EPA Region 6 Grants	Follow up with ADH by quarterly conference call
Topics of interest to be covered and/or presentations to be made at 5-State meeting in January 2016	ADH	ADH will present the state update

ATTACHMENT J
EPA Region 6 Sign In Sheet



Arkansas Department of Health



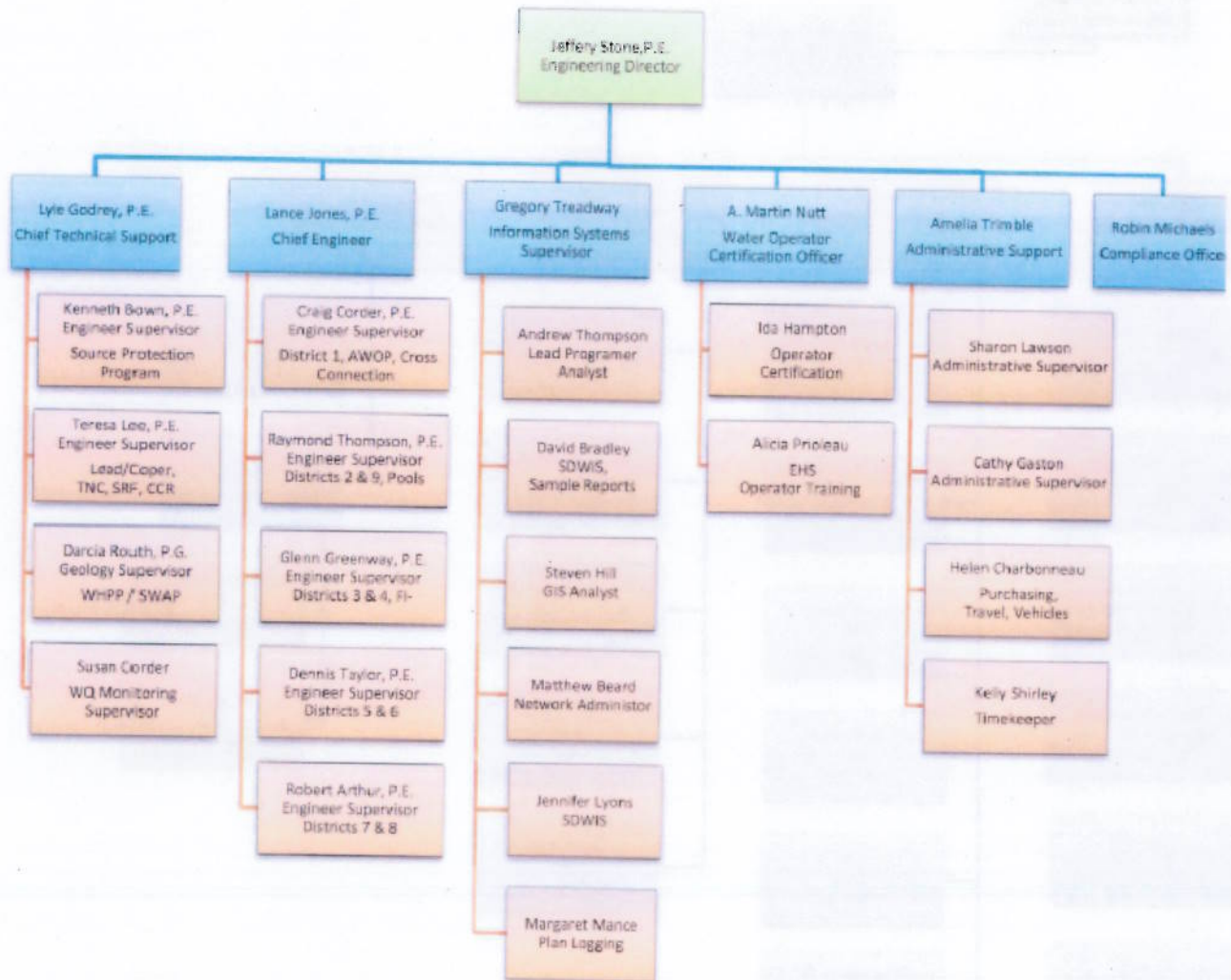
Arkansas Department of Health
FY 2014 End of Year
Tuesday, December 15, 2015
Sign-In Sheet

<u>Name</u>	<u>Title</u>	<u>Agency</u>
1. John H. Misty	Life Scientist	EPA Region 6
2. Lyle Godfrey	Chief, Technical Support	ADH
3. Lance Jones	Chief Engineer	ADH
4. Jim Brown	Associate Director	EPA Region 6
5. Tonia Bless	San Drinking Water Board	EPA Region 6
6. Susan Corder	Enforcement Officer	
7. Jeff Stone	Pollution Control Inspector Supervisor	ADH
8. Amelia Trimble	Director, Eng. Sect.	ADH
9. TERESA LEE	Budget Analyst	ADH
10. Martin Napp	ENGINEER SUPERVISOR	ADH
11. CRAIG CORDELL	ADH Environmental Super	ADH
12. David Bradley	ADH Engineer	ADH
13. Gregory Trenchum	Data Analyst	ADH
14. Robin Michaels	IS Planner	ADH
15. Gregory Arrish	Compliance	ADH
16. Shirley Macken	PWSS Project Mgr.	EPA
17.	EPS	EPA

ATTACHMENT K ADH Organizational Chart

Arkansas Department of Health Engineering Section

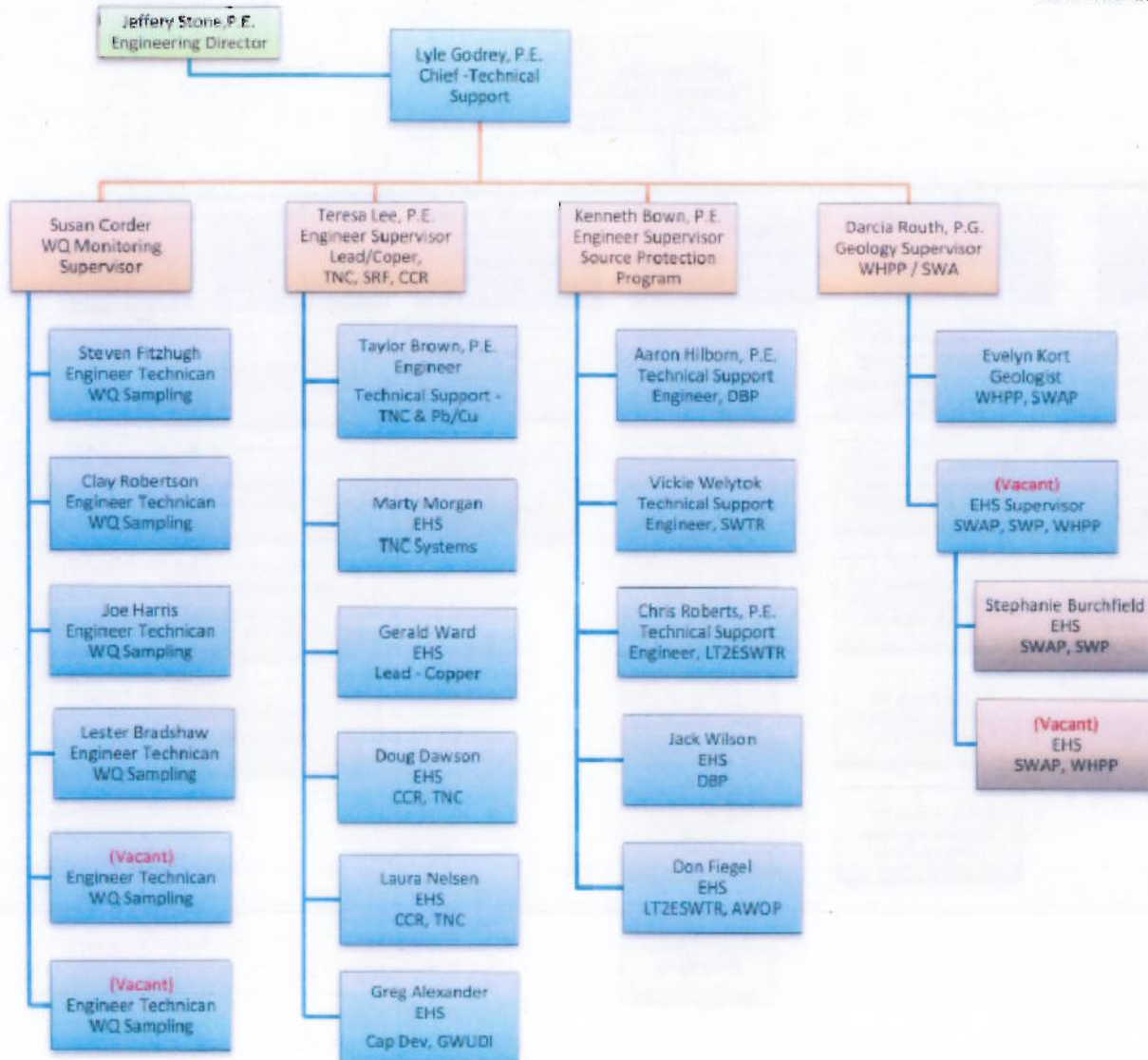
November 2015



ATTACHMENT K ADH Organizational Chart

Arkansas Department of Health Engineering Section Technical Support

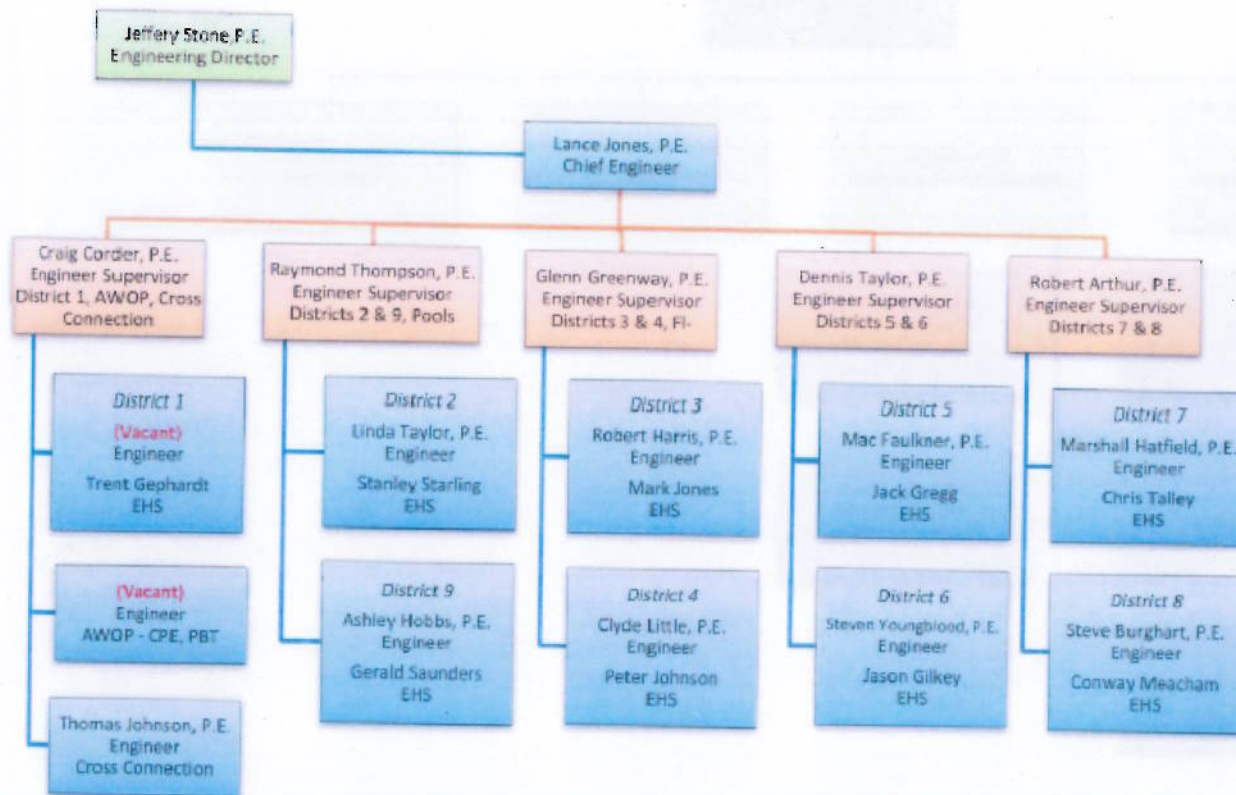
November 2015



ATTACHMENT K
ADH Organizational Chart

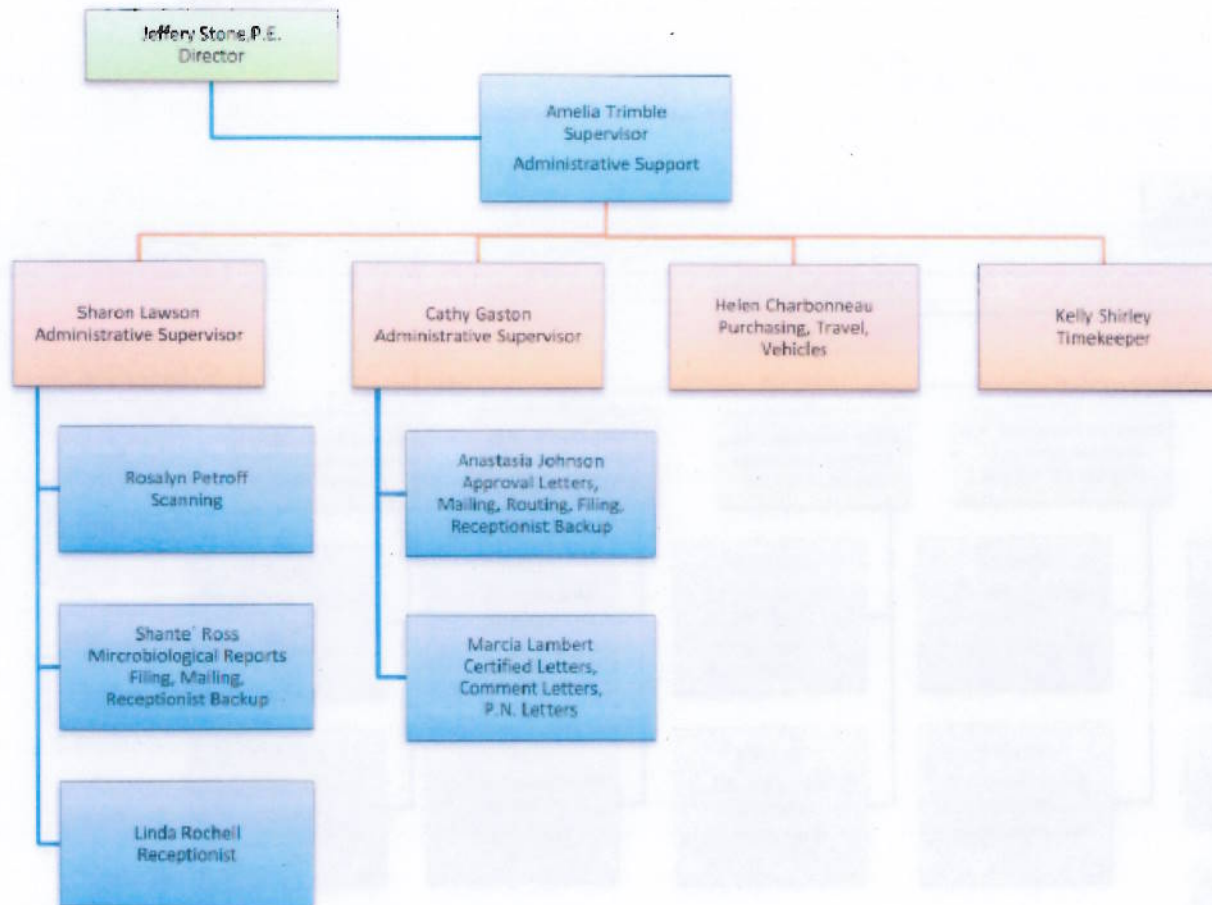
Arkansas Department of Health
Engineering Section
Field Surveillance

November 2015

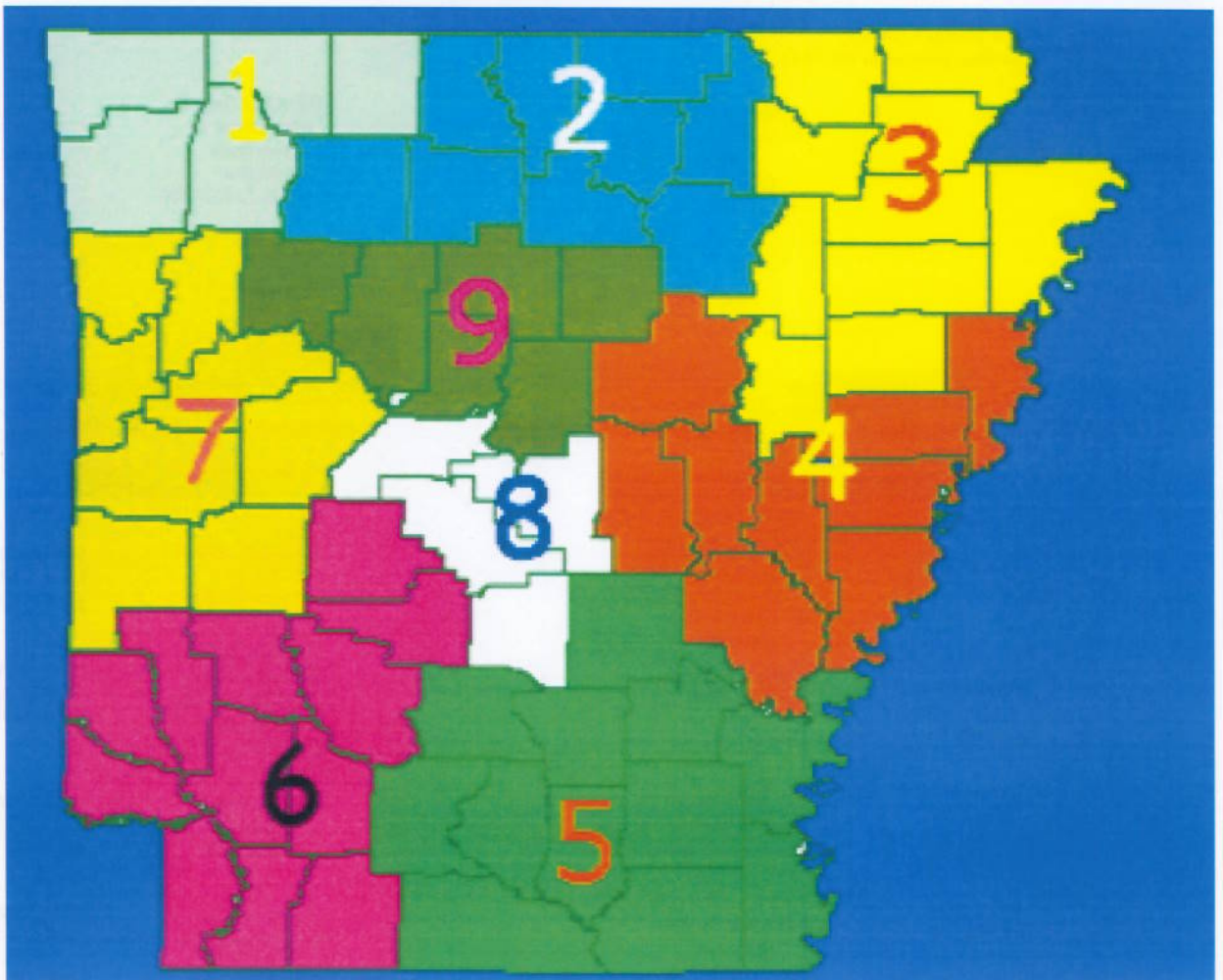


ATTACHMENT K
ADH Organizational Chart
Administrative Support

November 2015



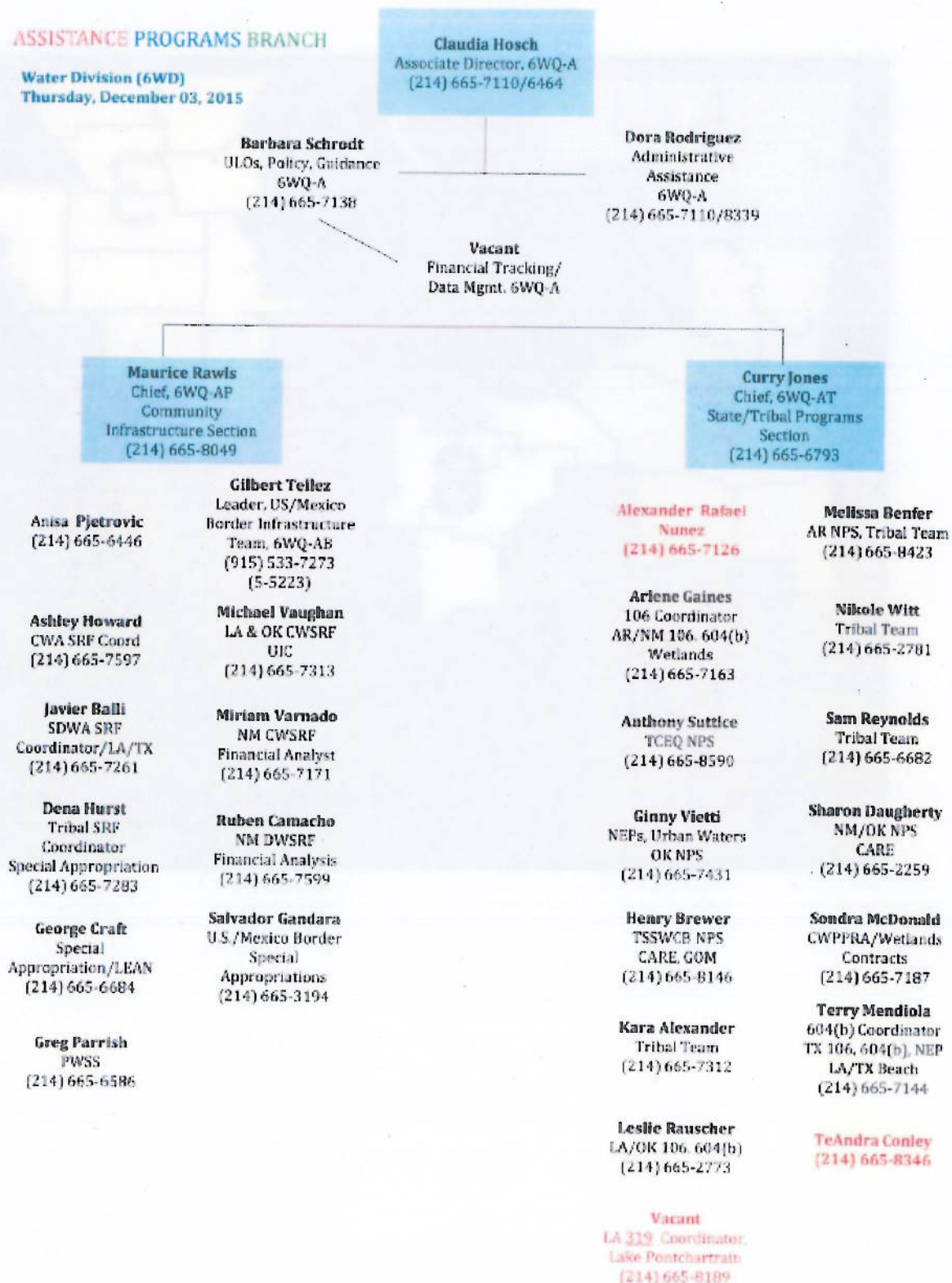
ATTACHMENT K
ADH Organizational Chart



ATTACHMENT L EPA Region 6 Funding Organizational Chart

ASSISTANCE PROGRAMS BRANCH

Water Division (6WD)
Thursday, December 03, 2015



ATTACHMENT M
EPA Region 6 Enforcement Organizational Chart

Water Enforcement Branch

Associate Director – Jerry Saunders	214-665-6470	saunders.jerry@epa.gov
Section Chief – Willie Lane	214-665-8460	lane.willie@epa.gov

Enforcement Coordinators

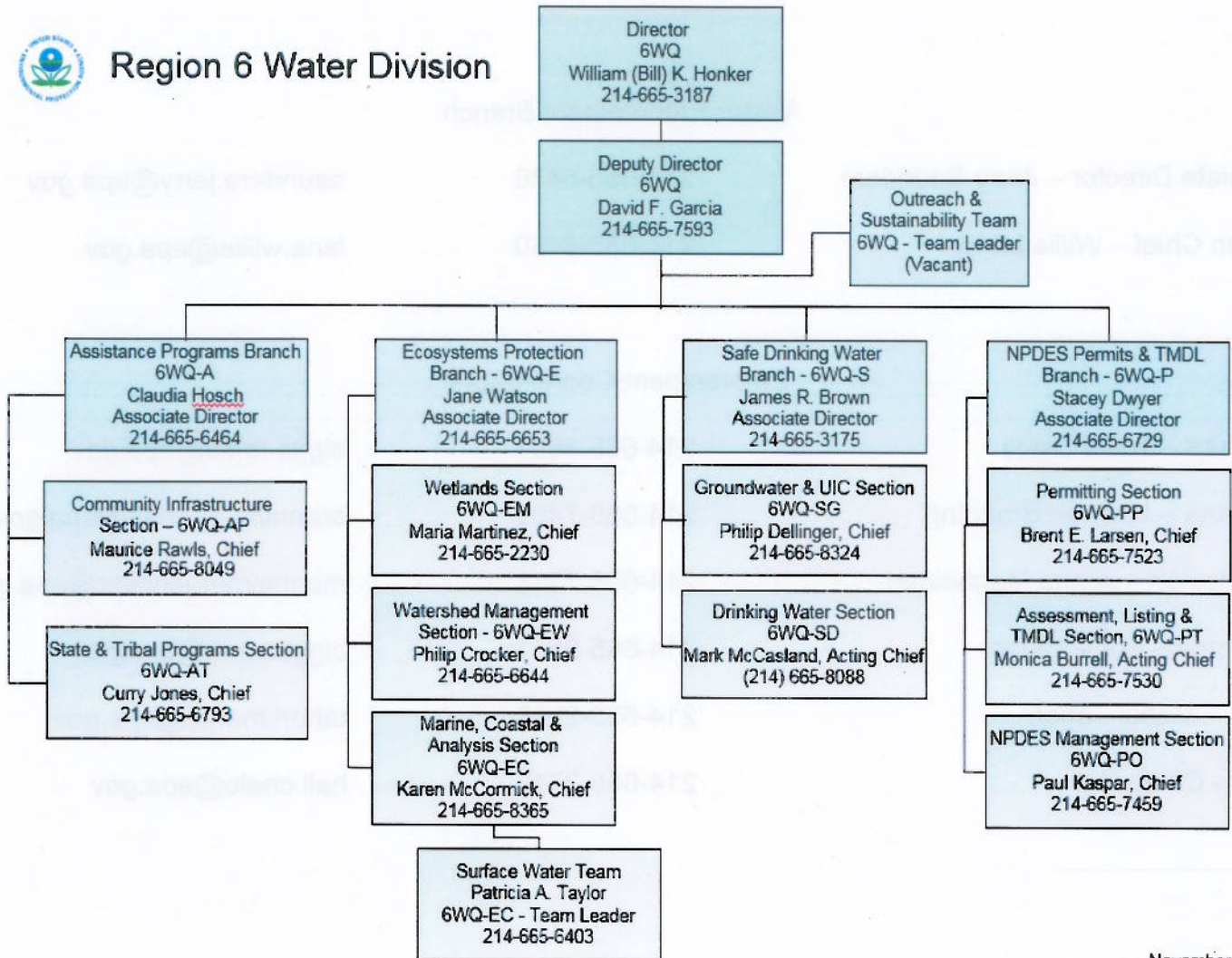
Arkansas – Tonia Biggs	214-665-8551	biggs.tonia@epa.gov
Louisiana – Hannah Branning	214-665-7489	branning.hannah@epa.gov
New Mexico – Jenna Manheimer	214-665-7318	manheimer.jennifer@epa.gov
Oklahoma – Tonia Biggs	214-665-8551	biggs.tonia@epa.gov
Texas – Mehdi Taheri	214-665-2298	taheri.mehdi@epa.gov
Tribal – Chelo Hall	214-665-2716	hall.chelo@epa.gov

ATTACHMENT N

EPA Region 6 Water Division Organizational Chart



Region 6 Water Division



November 17, 2015

ATTACHMENT O

EPA Region 6 Drinking Water Section Organizational Chart



EPA 6WQ Drinking Water Section Contacts



Source Water Protection Branch
(V) 214.665.7150 (F) 214.665.2191

Associate Director – Jim Brown
Section Chief – Mark McCasland (Acting)

214.665.3175 brown.jamesr@epa.gov
214.665.8808 mccasland.mark@epa.gov

<u>Programs/Rules</u>		<u>State Contacts</u>	
Aircraft DWR – Jatin Mistry	214.665.7483	Texas – Amy Camacho	214.665.7175
mistry.jatin@epa.gov		camacho.amy@epa.gov	
AWOP – José Rodriguez	214.665.8087	Oklahoma – Nichole Foster	214.665.7248
rodriguez.jose@epa.gov		foster.nichole@epa.gov	
Cap Dev – Amy Camacho	214.665.7175	Louisiana – Nancy Ho	214.665.3179
camacho.amy@epa.gov		ho.nancy@epa.gov	
Chemical Phase Rules – Kim Ngo-Kidd	214.665.7158	New Mexico – Angela Restivo	214.665.7123
ngo.kim@epa.gov		restive.angela@epa.gov	
Climate Awareness -Meaghan Bresnahan	214.665-8354	Arkansas – Jatin Mistry	214.665.7483
bresnahan.meaghan@epa.gov		mistry.jatin@epa.gov	
CCR – Nichole Foster	214.665.7248	Tribal – Kim Ngo-Kidd	214.665.7158
foster.nichole@epa.gov		ngo.kim@epa.gov	
Ground Water Rule – Nichole Foster	214.665.7248		
foster.nichole@epa.gov			
Emergency Response – Mark McCasland	214.665.8088		
mccasland.mark@epa.gov			
Lead /Copper – Shirley Mlachak	214.665.2267		
mlachak.shirley@epa.gov			
LT2 – Mark McCasland	214.665.8088		
mccasland.mark@epa.gov			
Operator Certification – Amy Camacho	214.665.7175		
camacho.amy@epa.gov			
Stage 2 DBPR – Nancy Ho	214.665.3179		
ho.nancy@epa.gov			
Radionuclides – Kim Ngo-Kidd	214.665.7158		
ngo.kim@epa.gov			
RTCR, SDWIS State – Andy Waite	214.665.7332		
waite.andrew@epa.gov			
SDWIS Fed – Shirley Mlachak	214.665.2267		
mlachak.shirley@epa.gov			
Source Water Protection – Miguel Moreno	214.665.7296		
moreno.miguel@epa.gov			
Surface Water Suite – Mark McCasland	214.665.8088		
mccasland.mark@epa.gov			

Updated December 22, 2015

